

City and County of San Francisco
The Planning Department

246-250 FRONT STREET

Revised

Draft Environmental Impact Report

96.643 & 95.343E

Revised Draft EIR Publication Date: June 21, 1997
Revised Draft EIR Public Hearing Date: July 24, 1997
Revised Draft EIR Public Comment Period: June 21 to July 24, 1997

Written comments should be sent to:
The Environmental Review Officer
The Planning Department
1660 Mission Street
San Francisco, CA 94103

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DATE: June 20, 1997

TO: Distribution List for the 246-250 Front Street Project Draft EIR

FROM: Hillary E. Gitelman, Environmental Review Officer

SUBJECT: Request for the Final Environmental Impact Report for the
246-250 Front Street Project

This is the Revised Draft Environmental Impact Report (EIR) for the 246-250 Front Street Project, prepared because the project has changed since a prior Draft EIR was circulated in 1995. A public hearing will be held on the adequacy and accuracy of this document. After the public hearing, our office will prepare and publish a document titled "Summary of Comments and Responses" which will contain a summary of all relevant comments on the Revised Draft EIR, as well as our responses to those comments; it may also specify changes to the Revised Draft EIR. Public agencies and members of the public who testify at the hearing on the Revised Draft EIR and those who testified on the 1995 Draft EIR will automatically receive a copy of the Comments and Responses document, along with notice of the date reserved for certification; others may receive such copies and notice on request or by visiting our office. This Revised Draft EIR together with the Summary of Comments and Responses document will be considered by the City Planning Commission in an advertised public meeting and certified as a Final EIR if deemed adequate.

After certification, we will modify the Revised Draft EIR as specified by the Comments and Responses document and print both documents in a single publication called the Final Environmental Impact Report. The Final EIR will add no new information to the combination of the three documents except to reproduce the certification resolution. It will simply provide the information in one rather than three documents. Therefore, if you receive a copy of the Comments and Responses document and this copy of the Revised Draft EIR, you will technically have a copy of the Final EIR.

We are aware that many people who receive the Draft EIR and Summary of Comments and Responses have no interest in receiving virtually the same information after the EIR has been certified. To avoid expending money and paper needlessly, we would like to send copies of the Final EIR to private individuals only if they request them. If you would like a copy of the Final EIR, therefore, please fill out and mail the postcard provided inside the back cover to the Office of Environmental Review within two weeks after certification of the EIR. Any private party not requesting a Final EIR by that time will not be mailed a copy.

Thank you for your interest in this project.

City and County of San Francisco
The Planning Department

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**246-250 FRONT STREET
REVISED DRAFT ENVIRONMENTAL IMPACT REPORT**

TABLE OF CONTENTS

	<u>Page</u>
<u>INTRODUCTION</u>	1
I. SUMMARY	3
II. PROJECT DESCRIPTION	14
A. Site Location and Project Characteristics	14
B. Project Sponsor's Objectives	24
C. Project Approval Requirements and General Plan Policies	24
III. ENVIRONMENTAL SETTING	30
A. Zoning and Land Use	30
B. Historic Architectural Resources	30
C. <u>Urban Design and Visual Quality</u>	42
IV. ENVIRONMENTAL IMPACTS	44
A. Historic Architectural Resources	44
B. <u>Urban Design and Visual Quality</u>	49
C. <u>Effects Found Not to be Significant</u>	52
D. Growth Inducement	61
V. MITIGATION MEASURES PROPOSED TO MINIMIZE THE POTENTIAL ADVERSE IMPACTS OF THE PROJECT	62
VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED	68
VII. ALTERNATIVES TO THE PROPOSED PROJECT	71
VIII. DISTRIBUTION LIST FOR THE REVISED DRAFT EIR	77
IX. APPENDICES	
X. EIR AUTHORS AND CONSULTANTS; ORGANIZATIONS AND PERSONS CONSULTED	

**246-250 FRONT STREET
REVISED DRAFT ENVIRONMENTAL IMPACT REPORT**

TABLE OF CONTENTS (continued)

	<u>Page</u>
 <u>LIST OF FIGURES</u> 	
1. Project Location	15
2. <u>Site (Ground Floor) Plan</u>	16
<u>2A. Upper Levels Plan</u>	17
<u>2B. Basement Plan</u>	18
<u>3A. Front Street Elevation</u>	21
<u>3B. Sacramento Street Elevation</u>	22
<u>3C. Planning Code Height and Bulk Districts</u>	31
4. Project Site and Nearby Buildings	37
5. Front-California Conservation District	45
<u>6. Rendering of Proposed Project</u>	51

LIST OF TABLES

<u>A. Project Characteristics</u>	19
1. Conservation Districts Compared	48
REF 711.4097 T93017r	

246-250 Front Street :
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INTRODUCTION

This chapter is newly added:

This Revised Draft Environmental Impact Report (Draft EIR) for the 246-250 Front Street Project has been prepared for a proposed seven-story office and retail building. In 1995, a Draft EIR was prepared for a two-story retail-only project proposed by the same project sponsor on the same site. An Initial Study and EIR Requirement was published on October 27, 1995, and a Draft EIR, on December 22, 1995, for the two-story building (Case No. 95.343E). Prior to certification of that EIR, however, the project sponsor decided to propose a revised project, which is the subject of this Revised DEIR.

Section 15088.5 of the State *CEQA Guidelines* states that "a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review . . . but before certification." In this case, the new information consists of substantial revision of the project, from a two-story retail building to a seven-story office and retail building, that could result in new or more substantial environmental impacts.

In this document, additions to the 1995 Draft EIR text are marked with underlining, while deletions are indicated in ~~strikethrough~~ text to allow the reader to quickly identify changes since the 1995 DEIR (except in the Table of Contents, where no strikethrough text is used, and in those cases where an entire section is added; in these latter instances, no underlining is used for easier reading, and the new text is introduced in italics, as at the beginning of this Introduction). (Underlining used in the 1995 Draft EIR, for example in section headings, remains.) These revision marks will not be included in the Final EIR. This Revised DEIR also includes the unchanged portions of the 1995 Draft EIR so that the reader may understand the changes in context. Each chapter and section heading includes the page number where it appeared in the 1995 Draft EIR.

The 1995 Initial Study determined that the then-proposed two-story project could not have a significant effect on the environment, except in regard to Historic Architectural Resources. This Revised DEIR includes a revised discussion of effects on Historic Architectural Resources that

could result from the seven-story project currently proposed. Because the environmental setting with regard to Historic Architectural Resources remains virtually unchanged from the 1995 EIR, only minor changes have been made, largely in response to comments received on the prior Draft EIR. Among the changes is the addition of a brief discussion of San Francisco's Unreinforced Masonry Building Ordinance. In general, however, the substance of the setting remains the same, and is not changed in this document.

In addition to Historic Architectural Resources, this document analyzes effects on Urban Design and Visual Quality (found to be less than significant in the 1995 Initial Study), since the proposed project would have greater mass and bulk than the 1995 project (see Sections III.C and IV.B, pp. 42 and 49, respectively). This Revised DEIR also includes a summary of other effects found to be less than significant in the 1995 Initial Study that were reanalyzed in light of the currently proposed project and found to remain less-than-significant effects (see Section IV.C, p. 52). Finally, this Revised DEIR analyzes alternatives to the project currently proposed.

Like the prior Draft EIR, this Revised DEIR will be circulated for public review and comment. Following publication of a Draft Summary of Comments and Responses, the City Planning Commission will consider certification of the EIR based on the information contained herein and in the Summary of Comments and Responses.

I. SUMMARY (1995 Draft EIR p. 1)

A. PROJECT DESCRIPTION (1995 Draft EIR p. 1)

The project site is in Downtown San Francisco, on the southeast corner of Sacramento and Front Streets. The approximately 12,600-square-foot site consists of Lot 18 of Assessor's Block 236, and is partially occupied by two vacant two-story brick structures. The project would demolish the existing buildings and a former parking lot on the site and would construct a ~~two-seven-story, 36-105-foot-tall~~ building containing ~~up to approximately 24,000~~ 92,700 gross square feet (gsf) of office, retail and associated lobby and storage space, as well as parking and loading, including about 49,150 gsf of office space and about 24,200 gsf of retail space (With an optional plan second-floor office space, retail space would be about 11,700 gsf and office space would be about 61,650 gsf.) ~~One~~ Fifteen off-street parking spaces and two off-street service vehicle loading spaces would be provided in a single basement level. (About 35 parking spaces could be provided if valet parking were offered.) The upper two stories (30 feet) would be set back approximately 75 feet from Front Street to comply with the existing 75-foot height limit.

The two buildings proposed for demolition as part of the project are designated Category IV - Contributory Buildings under Article 11 of the *City Planning Code*, which addresses preservation of buildings and districts of architectural, historical, and aesthetic importance in the C-3 (Downtown Commercial) zoning districts. Both buildings are also within the Front-California Conservation District defined in Appendix H of Article 11. The exterior of the new building is proposed to include a combination of brick, thin-shell cast stone and other materials intended to be sympathetic to nearby historic buildings. ~~The off-street loading dock on Sacramento Street would occupy about 350 sq. ft. and would serve uses on both floors of the new building.~~

The project would provide approximately 1,550 square feet of open space required by the *City Planning Code* in the form of widened sidewalk "bulbs" on both sides of Front Street at Sacramento Street, which would eliminate eight on-street loading zone spaces on Front Street. The project would require an exception to Section 154(b) of the *City Planning Code* because it would provide van loading spaces, rather than standard truck spaces.

B. AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED (1995 Draft EIR p. 1)

This environmental impact report, for a proposed retail project at 246-250 Front Street, focuses on the issue of historic architectural resources, and specifically on the proposed project's potential effects on the Front-California Conservation District. All other potential environmental effects were found to be at a less-than-significant level or to be mitigated to a level of less-than-significance with mitigation measures agreed to by the project sponsor. Please see the Initial Study, included in this document as Appendix A, Section IV.B, Urban Design and Visual Quality, p. 49, and Section IV.C, Effects Found Not to be Significant, p. 52, for analysis of issues other than historic architectural resources and growth inducement.

The principal issue addressed in this environmental impact report concerns the effect on the Front-California Conservation District of the proposed demolition of the two Category IV buildings on the project site. The project sponsor has indicated that remodeling the existing buildings, including upgrading them to meet the seismic safety requirements of applicable building code standards, would prove economically infeasible. On the other hand, some may feel that the buildings proposed for demolition should be preserved because they are located in the Front-California Conservation District established under Article 11 of the *City Planning Code*.

While economic issues such as the cost of remodeling and retrofitting the existing buildings are not environmental concerns, the EIR does discuss possible remodeling/retrofitting of the buildings in Chapter VII, Alternatives, p. 71. The City Planning Commission (or Board of Supervisors on appeal) will decide whether to approve or disapprove the proposed project after review and certification of the EIR. In selecting or rejecting project alternatives, decision-makers may also make use of other information in the public record, such as cost estimates associated with remodeling/retrofitting of the buildings.

C. MAIN ENVIRONMENTAL EFFECTS (1995 Draft EIR p. 2)**HISTORIC ARCHITECTURAL RESOURCES**

The project proposes demolition of the existing buildings on the project site and construction of a new ~~two~~-seven-story building. Demolition would eliminate two buildings rated Category IV - Contributory Building under Article 11 of the *City Planning Code*. Under Section 1112.2 of the *City Planning Code*, an application for demolition of a Contributory Building in a conservation

district shall be approved if a permit has been issued for a replacement structure, in accordance with Section 1113, which requires that new construction be compatible in scale and design with the conservation district.

While the project's effect on the subject buildings themselves (demolition) is apparent, the project's potential effect on the Front-California Conservation District is less clear. The Front-California Conservation District, when originally designated under Article 11, contained 19 buildings, of which six were Significant Buildings (Category I and II) and six others were Contributory Buildings (Category III and IV). Three rated buildings (one Category I and two Category IV) were demolished in the 1980s, leaving nine of the original 12 rated (Category I through IV) buildings in the District. The proposed project would further reduce the number of rated buildings within the conservation district to seven.

With project implementation, four Category I or II buildings on California Street would comprise four-sevenths of the remaining rated (Category I through IV) buildings within the District. There would be one rated structure on the east (project) side of Front Street, and two on the west side of Front Street. Changes in the number and concentration (distribution) of rated buildings within the conservation district, whether attributed to past demolitions or to the proposed project, have the effect of reducing the integrity or significance of the district, and could ~~require that~~ justify amendment of the City Planning Code ~~be amended~~ to eliminate the Front-California Conservation District, or to re-draw its boundaries. However, project approval would not trigger a process for elimination or reduction in size of the conservation district. Planning Department staff has concluded that project-related changes, when combined with past changes within the district, would constitute a cumulatively significant effect on the Front-California Conservation District that cannot be mitigated to a less-than-significant level.

The proposed new structure would have a Front Street street wall that would be taller than the existing buildings on the site, similar in height to the two other existing buildings on the east side of Front Street, and within the typical range of building heights within the Conservation District. The project would have a setback at the predominant street wall, as recommended in City Planning Code Article 11, Appendix H, and, because of its location, would not substantially diminish midday sunlight on Front Street. Exterior materials are intended to be sympathetic to nearby historic buildings. The new building would be a two-part vertical composition with a belt course between the first and second stories; this would be consistent with existing buildings on Front Street; the facades would be visually broken into smaller units by a series of pilasters and multiple doorways, and a cornice would extend along the top of both facades. As required by the

City Planning Code, the project would in general be compatible with the composition and massing, scale, materials and colors, and detailing and ornamentation of existing historic buildings in the Front-California Conservation District, and particularly on Front Street.

The following subsection is newly added prior to Section D, Mitigation Measures:

URBAN DESIGN AND VISUAL QUALITY

The proposed project would result in a visual change, since it would demolish two existing buildings and replace them and a former parking area with one substantially larger and taller building, which would be visible from greater distances. However, the Front Street facade, at five stories (about 78 feet) would be generally comparable in height to the other two buildings on the east (project) site of Front Street, and thus would not appear out of scale when viewed from the street. The project's Front Street street wall would be taller than that of most buildings in the historic district, and the project would have longer street frontages than most buildings in the district. The project, including its 105-foot tower, would be substantially shorter than nearby modern development, including the office tower at 100 California Street and the Embarcadero Center towers across Sacramento Street.

The project generally would employ a design intended to achieve visual compatibility with adjacent and nearby historic buildings through inclusion of facade details such as pilasters and divided-light windows, and the use of such materials as brick and stone. Although some observers may object to the design of the proposed project, it would not result in a substantial demonstrable negative aesthetic effect on the visual character of the area, nor would it substantially change or block any scenic vista currently enjoyed from nearby parks and open spaces.

D. MITIGATION MEASURES (1995 Draft EIR p. 3)

As described in the attached Initial Study (Appendix A), the proposed project has the potential to affect archaeological resources, would involve pile driving, and could involve exposure to hazardous materials. As a result, the project sponsor has agreed to implement the following mitigation measures:

MEASURES PROPOSED AS PART OF THE PROJECT

- Given the location and ~~depth magnitude~~ of excavation proposed, and the ~~likelihood possibility~~ that archeological resources would be encountered on the project site, the sponsor has agreed to retain the services of an archaeologist. The archaeologist would carry out a pre-excavation testing program to better determine the probability of finding cultural and historical remains. The testing program would use a series of mechanical exploratory borings or trenches and/or other testing methods determined by the archaeologist to be appropriate. ~~first determine, in conjunction with the Environmental Review Officer (ERO), whether he/she should instruct all excavation and foundation crews on the project site of the potential for discovery of archacological resources, and the procedures to be followed if such resources are uncovered.~~

If, after testing, the archaeologist determines that no further investigations or precautions are necessary to safeguard potentially significant archaeological resources, the archaeologist would submit a written report to the Environmental Review Officer (ERO), with a copy to the project sponsor. If the archaeologist determines that further investigations or precautions are necessary, he/she shall consult with the ERO and they shall jointly determine what additional procedures are necessary to minimize potential effects on archaeological resources.

~~The archeologist would then design and carry out~~ These additional mitigation measures would be implemented by the project sponsor and might include a program of on-site monitoring of all ground-disturbing activities, during which he/she would record observations in a permanent log. The monitoring program, whether or not there are finds of significance, would result in a written report to be submitted first and directly to the ERO, with a copy to the project sponsor. During the monitoring program, the project sponsor would designate one individual on site as his/her representative. This representative would have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources should they be encountered.

Should evidence of cultural resources of potential significance be found during the monitoring program, the archaeologist would immediately notify the Environmental Review Officer (ERO), and the project sponsor would halt any activities which the archaeologist and the ERO jointly determine could damage such cultural resources. Ground-disturbing activities that might damage cultural resources would be suspended for a total maximum of four weeks cumulatively over the course of construction.

After notifying the ERO, the archaeologist would prepare a written report to be submitted first and directly to the ERO, with a copy to the project sponsor, which would contain an assessment of the potential significance of the find and recommendations for what measures should be implemented to minimize potential effects on archaeological resources. Based on this report, the ERO would recommend specific additional mitigation measures to be implemented by the project sponsor. ~~Mitigation~~ These additional measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation, and recovery of cultural material.

Finally, the archaeologist would prepare a draft final report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure would be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report would be sent by the archaeologist directly to the President of the Landmarks Preservation Advisory Board and the Northwest Information Center of the California Historical Resources Information System. The Office of Environmental Review shall receive three copies of the final archaeological report, accompanied by transmittals documenting its distribution to the Landmarks Preservation Advisory Board and the Northwest Information Center.

- The project sponsor would require the construction contractor to pre-drill piles where soil conditions permit.
- The project sponsor would require the contractor(s) to sprinkle demolition sites with water during demolition, excavation and construction activity; sprinkle unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soil, sand or other such material; and sweep surrounding streets during demolition and construction at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose.
- One or more geotechnical investigations by a California-licensed geotechnical engineer are included as part of the project. The project sponsor and contractor would follow the recommendations of the final geotechnical report(s) regarding any excavation and construction for the project. The project sponsor would ensure that the construction contractor conducts a pre-construction survey of existing conditions and monitors the adjacent building for damage during construction, if recommended by the geotechnical engineer.
- ~~In the event that~~ As project construction would involve excavation of more than 50 cubic yards of soil, requirements established by Article 20 of the *San Francisco Public Works Code* (i.e., the "Maher Ordinance") would reduce potential effects related to soil contamination to a less-than-significant level. ~~In the event that project construction would involve excavation of less than 50 cubic yards, and/or would encapsulate soil containing hydrocarbons and soluble lead concentrations above established thresholds, the requirements of Article 20 would not strictly apply, although~~ The project sponsor has prepared a Site Mitigation Plan (refer to page 60) and has agreed to ensure that the Site Mitigation Plan is implemented with oversight from the City's Department of Public Health.

The Plan would require that the construction contractor ~~limit the amount of excavation,~~ handle and dispose of excavated soils properly, employ worker health and safety and dust control procedures, and encapsulate remaining soils on-site, and also would require a State Registered Professional Geologist or Engineer to certify, at the completion of foundation

activities, that all elements of the Site Mitigation Plan had been performed in compliance with Article 20 requirements. Conditions imposed by the Department of Public Health would require dust control measures to ensure "no visible dust" emissions, covering of soil stockpiles, rain water runoff control, and designation of a person with the authority to stop work at any time if a release of contaminated soil occurs or is threatened. The Department of Public Health would also require preparation of a site management plan and placement of a deed restriction on the property to insure the future integrity of the cap on contaminated soils to be left in place (i.e., the slab foundation), and to provide safe procedures for both routine and emergency breaching of the cap that may be required in the future.

- The project sponsor would ensure that building surveys for asbestos (if required), PCB-containing equipment (including elevator equipment), hydraulic oils, fluorescent lights, and lead-based paint are performed prior to the start of demolition. (Removal and proper disposal of the hydraulic lift and associated fluids was included in the Site Mitigation Plan.) Any hazardous materials so discovered would be abated according to federal, state, and local laws and regulations.

The project sponsor has further agreed to implement the following measures, which would reduce but not eliminate potentially significant adverse effects on the Front-California Conservation District.

- Prior to demolition of the buildings on the project site, the project sponsor would employ an architectural historian to document the Front-California Conservation District, the subject buildings, and their history in greater detail than has been done to date. The project sponsor would submit that documentation, along with modified-format Historic American Buildings Survey drawings of the buildings, to the History Room of the San Francisco Main Library and the Secretary of the Landmarks Preservation Advisory Board, and possibly to the California Historical Society.
- To promote understanding of the Front-California Conservation District, the project sponsor would install on or near the replacement structure a plaque and/or other monument memorializing the District and the two buildings to be demolished. A plaque would be mounted on the front of the new building to provide pedestrians with both a photographic image of the demolished buildings and information about the history of the buildings and the District. Design and placement of any plaque or monument would be reviewed and approved by staff of the Landmarks Preservation Advisory Board. The project sponsor would also relocate to the new building the existing plaque marking the former site of Fort Gunnybags.

E. ALTERNATIVES TO THE PROPOSED PROJECT (1995 Draft EIR p. 6)**ALTERNATIVE A: NO PROJECT**

This alternative would entail no change to the site, which would remain in its existing condition, with the two structures, parking lot and vacant site. No demolition would occur. This alternative would not preclude, but would not necessarily entail, reoccupancy of the existing buildings. If the No Project Alternative were implemented, no impacts of the project would occur. However, the buildings on the project site ultimately would have to be brought into compliance with the City's Unreinforced Masonry Building Ordinance through seismic upgrade or demolition.

ALTERNATIVE B: SEISMIC UPGRADE AND ADAPTIVE REUSE

Under this alternative, the two existing buildings on the project site would be rehabilitated and seismically upgraded in accordance with the requirements of applicable building code standards. The buildings would be used for retail stores, on the ground floor, and for retail or office use on the second story, ~~as with the proposed project.~~ The existing parking lot would be used for parking, and the vacant site at the corner of Sacramento and Front Streets would remain vacant.

This alternative would avoid demolition of the existing buildings and would not change the Front-California Conservation District, except by rehabilitating the existing buildings on the project site. Effects related to the intensity of development and described in the Initial Study included in Appendix A and in Section IV.C, Effects Found Not to be Significant (population, transportation, operational noise and air quality emissions, and demand for public utilities/services and energy) would be substantially less than with the currently proposed project, because of the reduced retail square footage, and potential for no office use. Effects on subsurface cultural resources, construction-related noise and air quality, hydrology, and hazardous materials in the soil, if any, ~~could also~~ would be less substantial than with the project, because there would be less (or no) excavation and no pile driving. Effects related to hazardous building materials, land use, and biology would be comparable to those of the proposed project. Visual impact would be substantially less. This alternative would result in less total floor area, in form of two smaller floorplates, than would the project, and therefore this alternative would not meet the project sponsor's objectives of providing the maximum uninterrupted retail floor area and developing Class A office space on the project site.

The following two alternatives, C and D, replace text describing Alternative C on 1995 DEIR p. 7:

ALTERNATIVE C: SEISMIC UPGRADE, ADAPTIVE REUSE AND NEW CONSTRUCTION

Under this alternative, the two existing buildings on the project site would be rehabilitated and seismically upgraded, and a new five-story L-shaped structure built on the remainder of the site, wrapping around the existing buildings. The new building and the two existing buildings would be physically connected through openings in the side and rear walls of the existing buildings.

Under this alternative, the three buildings would function as a single structure at the ground floor and second story; the ground floor would be occupied by retail use(s) and could accommodate a single retail tenant, albeit with interruptions in the floor plate. The buildings could support retail or office use at the second story, and the new building would be occupied by office uses on levels 3 through 5. This alternative would include no basement, no on-site parking or loading facilities, and no mezzanine retail storage, and would result in development of similar retail square footage as the project (*i.e.*, about 24,000 gsf), while office space would total about 25,000 gsf, or about half that with the project. Total square footage would be approximately 49,000 gsf.

This alternative would avoid demolition of the existing buildings. Assuming the new construction were of sympathetic design, as required by *City Planning Code* Section 1113, this alternative would have no substantial adverse effect on the Front-California Conservation District. Additional openings would be cut in the walls of the existing buildings, but the buildings would remain separate structures by virtue of the seismic strengthening scheme that would be used, meaning that this alternative could qualify for a federal tax credit for rehabilitation of historic properties. Because this alternative would retain the existing buildings on the project site, it would not result in a relatively uniform street wall along most of the east side of Front Street, as would the project. To the extent that preservation of the existing buildings would be considered visually desirable, this alternative could have less visual impact than the proposed project. Effects related to the intensity of development (population, traffic, transit and pedestrian activity, operational noise and air quality emissions, and demand for public utilities/services and energy) would be somewhat less than those of the proposed project, since the total square footage of this alternative would be less. This alternative, with no parking, would result in a net parking shortfall that would be the same as the project's, due to less parking demand. With no loading spaces but with smaller open space bulbs on Front Street anticipated

to displace fewer loading spaces, this alternative would not be expected to result in any greater shortfall in on-street loading spaces than would the project. Effects on subsurface cultural resources and construction-related air quality, geology, hydrology, and hazardous materials effects would be less intensive than those of the project, since there would not be excavation for a basement. Construction-related noise and land use impacts would be comparable to those of the project. This alternative would provide only about half of the proposed office space, and would not fully meet the sponsor's objective for development of office space, and also would not meet the sponsor's objective of providing the maximum uninterrupted retail floor area on the project site.

ALTERNATIVE D: SEISMIC UPGRADE, ADAPTIVE REUSE AND NEW CONSTRUCTION ENCOMPASSING THE EXISTING BUILDINGS

This alternative would entail construction of a project of essentially the same height, mass and bulk as the proposed project, but would incorporate the existing buildings into the development. The existing buildings would be rehabilitated and seismically upgraded, and the new building would be constructed adjacent to and above the existing buildings, in a manner somewhat similar to that which incorporated the Hoffman Grill on Market Street (City Landmark No. 144). The existing buildings would be physically surrounded by the new structure, except on the Front Street facades. The design of the new building would be made compatible to the existing structures to the maximum extent feasible. No on-site parking or loading and no mezzanine retail storage would be built. Office and retail square footage would be similar to that with the project, about 49,000 gsf and about 24,000 gsf, respectively; total square footage would be about 73,000 gsf.

This alternative would largely avoid demolition of the existing buildings. Assuming the new construction were of sympathetic design, as required by *City Planning Code* Section 1113, this alternative might have no substantial adverse effect on the Front-California Conservation District. This alternative would retain most of the existing buildings as separate structures, and could qualify for the federal tax credit for rehabilitation of historic properties. However, construction of the new structure above the existing buildings would require that piles be driven through the basement of the existing building(s) and possibly that the new structure's south structural members displace portions of the south wall of the existing building at 246 Front Street. Without detailed design plans, it is unknown whether visual integration of the existing buildings into the new structure could be accomplished. Transportation effects of this alternative would be similar to those of the project, except that with no on-site parking or loading, the net

parking shortfall and net shortfall in on-street loading spaces would be greater than with the project (and Alternative C). Parking demand could be accommodated in nearby garages and lots, but the shortfall in loading space could result in more double-parking on Front Street at times of peak demand for loading space, although these times generally do not coincide with periods of peak traffic flow. Other effects generally would be similar to those of the project, except that with no basement, construction effects (air quality, geology and hydrology, hazardous materials) and the potential for disturbance of archaeological resources would be less substantial. Like Alternative C, this alternative would not provide for the maximum uninterrupted retail floorplate, and would thus not fully meet the sponsor's objectives for development of retail space. Further, construction of this alternative could be substantially more difficult due to the necessity to build a new structure both above and around the existing buildings.

II. PROJECT DESCRIPTION (1995 Draft EIR p. 8)

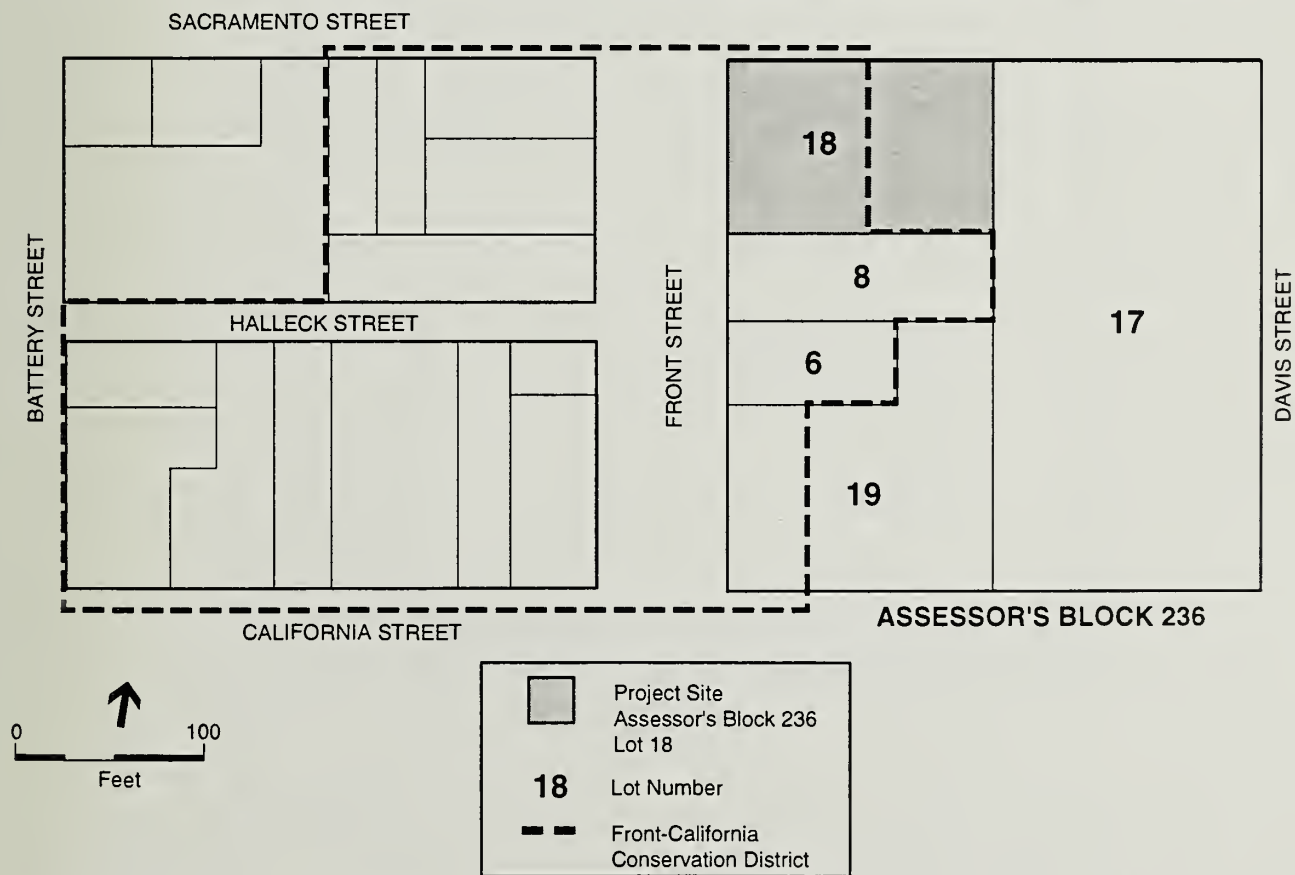
Chapter II is replaced in its entirety by the following:

A. SITE LOCATION AND PROJECT CHARACTERISTICS

The project site is in Downtown San Francisco, on the southeast corner of Sacramento and Front Streets (see Figure 1). The approximately 12,600-square-foot site consists of Lot 18 of Assessor's Block 236, and is currently occupied by two vacant two-story structures, a former parking lot, and a vacant building site. Other than the existing buildings, the entire site is fenced.

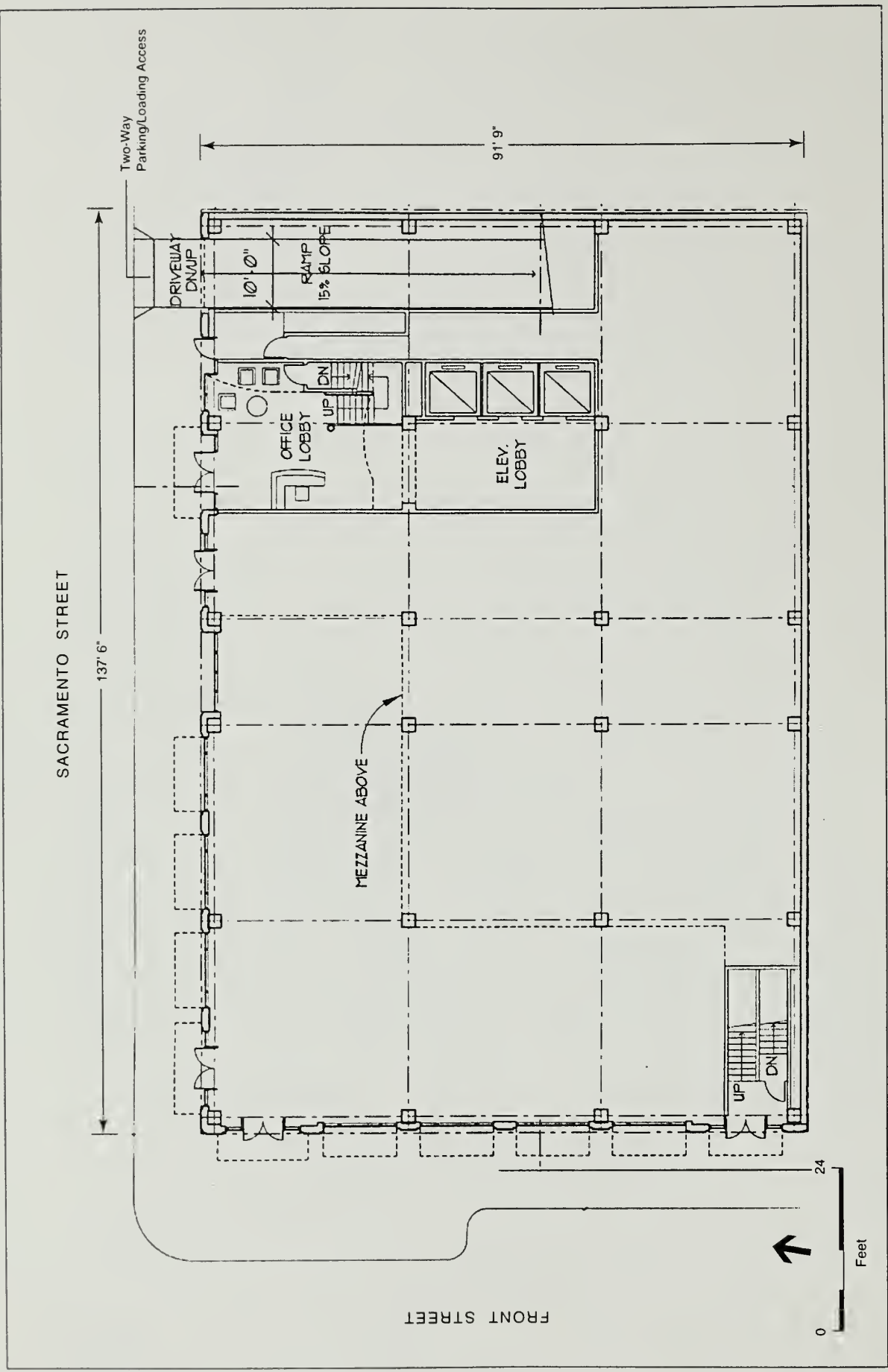
The project would demolish the two existing buildings and remove the former parking lot on the site and would construct a seven-story, 105-foot-tall building containing approximately 92,700 gross square feet (gsf) of office, retail and associated lobby and storage space, as well as parking and loading; approximately 74,550 gsf would be counted as gross floor area, according to the *City Planning Code*, and the Floor Area Ratio would be 5.9:1.¹ The building would include about 49,150 gsf of office space and about 24,200 gsf of retail space, anticipated to be "convenience retail" space (*i.e.*, retail stores that would be expected to serve primarily nearby employees and residents). The building would have about 6,150 gsf of storage space in a mezzanine above the ground floor, and about 650 gsf of ground-floor lobby space. A single basement level, accessible via a ramp from Sacramento Street, would contain about 12,550 gsf, including approximately 15 independently accessible parking spaces and 2 service van loading spaces, as well as the access ramp. (The basement would contain about 8,000 gsf of parking excluding loading and ramp areas, which would accommodate about 35 tandem valet spaces if the sponsor or building manager were to implement valet parking.) The project would require an exception to Section 154(b) of the *City Planning Code* because it would provide van loading spaces, rather than standard truck spaces. Figure 2, p. 16, shows the ground floor plan, Figure 2A, p. 17, shows upper-story floor plans, and Figure 2B, p. 18, shows the basement plan. Table A, p. 19, summarizes project characteristics.

¹ Gross floor area is the area of the building applicable to floor area ratio (FAR) calculations and is also used in the calculation of permitted office space under Sections 321 and 322 of the City Planning Code (Office Development Annual Limit). Gross floor area excludes certain portions of the building, including accessory parking and loading space, mechanical and building storage space, and, in the downtown zoning districts, ground-floor lobby space and a portion of ground-floor "convenience" retail space.



SOURCE: Environmental Science Associates; San Francisco Planning Department. Case No. 93.543E & 96.643E: 246-250 Front Street ■

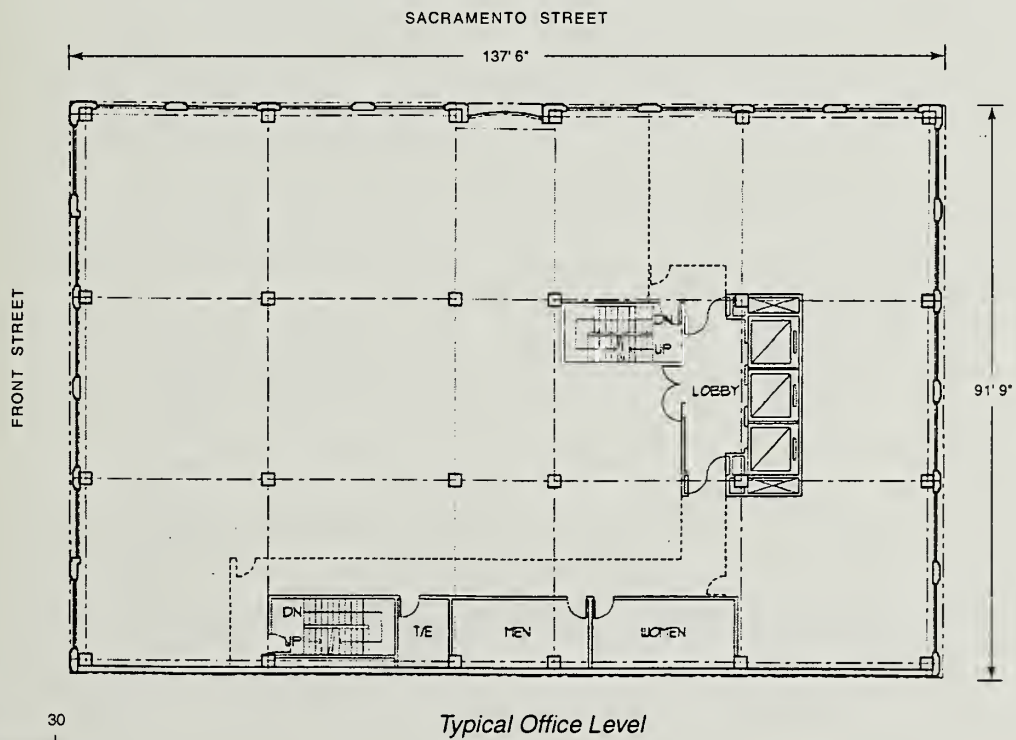
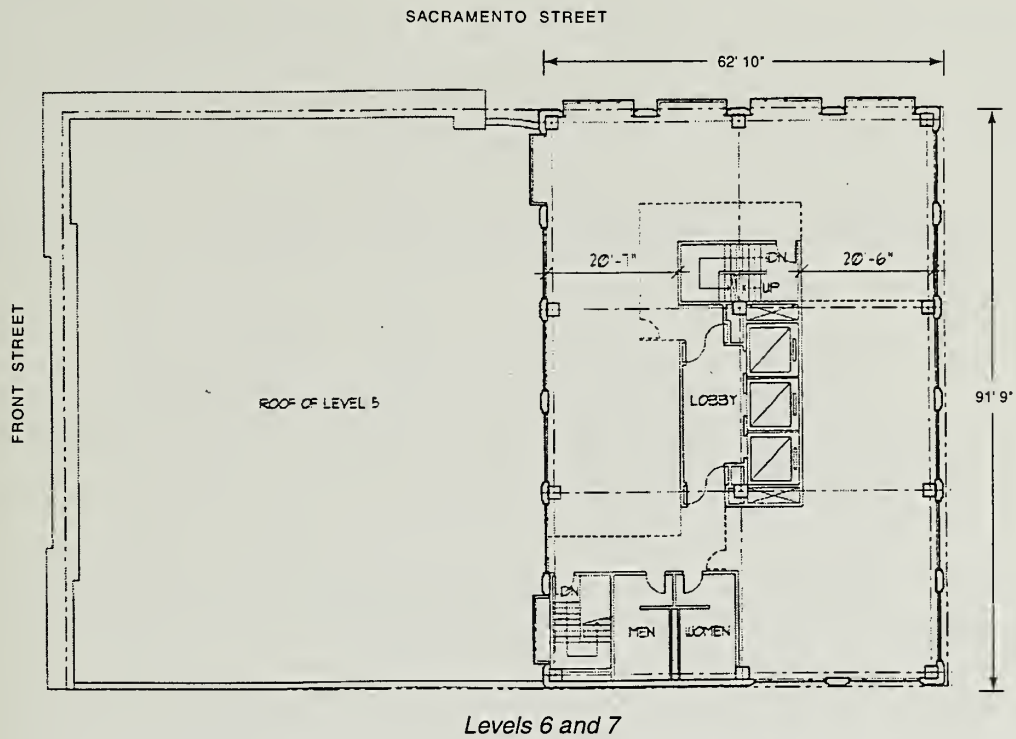
Figure 1
Project Location



Case No. 93.543E & 96.643E; 246-250 Front Street ■

Figure 2
Site Plan (Ground Floor)

SOURCE: Heller Manus Architects



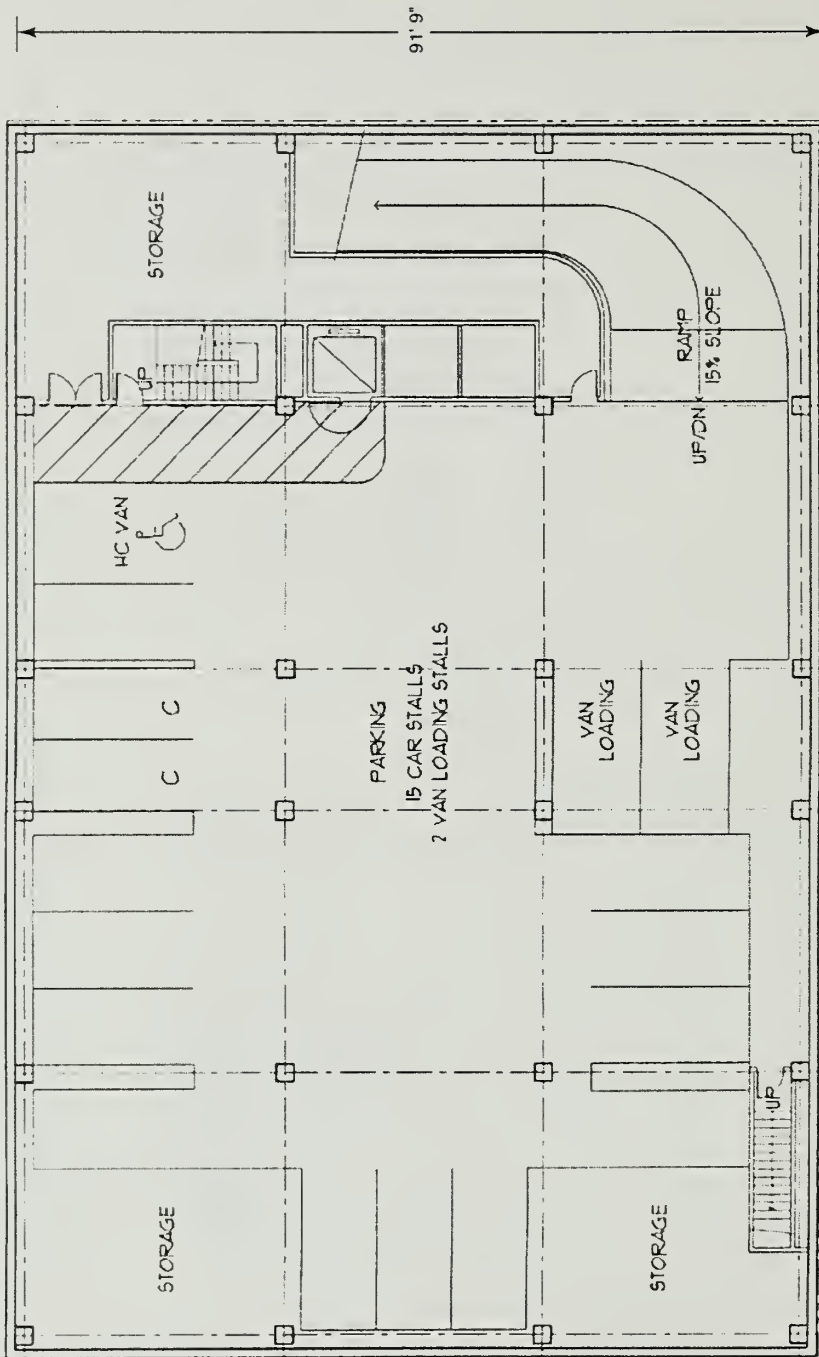
SOURCE: Heller Manus Architects

Case No. 93.543E & 96.643E: 246-250 Front Street ■

Figure 2A
Upper Levels Plan

SACRAMENTO STREET

137' 6"



FRONT STREET



0 24 Feet

Case No. 93.543E & 96.643E: 246-250 Front Street ■
Figure 2B
 Basement Plan

SOURCE: Heller Manus Architects

TABLE A: PROJECT CHARACTERISTICS

<u>Proposed Use</u>	<u>Amount</u>	<u>Gross Square Feet</u>	<u>Gross Floor Area^a</u>
Retail ^b	2 stories	24,195	19,195
Office ^b	5 stories	49,170	49,170
Parking	15 spaces ^c	12,535	0
Loading ^d	2 svc. veh. spaces	--	--
Retail Storage	--	6,170	6,170
Lobby	--	650	0
TOTAL	--	92,720	74,535
Building Height ^{e,f}	75 feet / 78 feet with parapet and cornice (Front St. wall) 101 feet / 105 feet with parapet and cornice (east end of Sacramento St. wall)		
Site area	12,600 sq. ft.		
Floor area ratio	5.9:1		

- ^a In gross square feet. Gross floor area excludes certain portions of the building, including accessory parking and loading space, mechanical and building storage space, ground-floor lobby space and 5,000 gross square feet of ground-floor "convenience" retail space.
- ^b With an optional plan in which the second floor would be used as office space, retail space would be 11,725 gsf and office space would be 61,640 gsf.
- ^c Approximately 35 parking spaces would be provided if valet parking were offered.
- ^d Loading square footage included with parking. Basement would also include small areas of building storage.
- ^e *City Planning Code* Sec. 260(b)(2)(A) excludes parapets up to four feet in height from height limits.
- ^f Excludes 7-foot mechanical penthouse set back from Front and Sacramento Street tower walls.

It is anticipated that the project could be built in two phases: Phase 1 would consist of a one story plus mezzanine, 28-foot-tall building containing approximately 11,725 gsf of convenience retail space and about 6,150 gsf of storage space on the mezzanine. The basement level parking and loading would also be constructed. Phase 2 would be the construction of an additional six stories, containing an additional retail story of about 12,475 gsf and approximately 49,150 gsf of

office space, on top of the Phase 1.² (The Phase 1 improvements would include the foundation required for Phase 2, so that Phase 2 could be constructed without demolition of the Phase 1 improvements.) The upper two stories (the uppermost 30 feet in height) would be set back approximately 75 feet from Front Street to comply with the existing 75-foot height limit on Front Street, where the facade would be five stories tall. Figures 3A and 3B, pp. 21 and 22, show the Front Street and Sacramento Street elevations of the Phase 2 (built-out) project, respectively, with the setback visible in the Sacramento Street elevation. Lot coverage would be 100 percent.

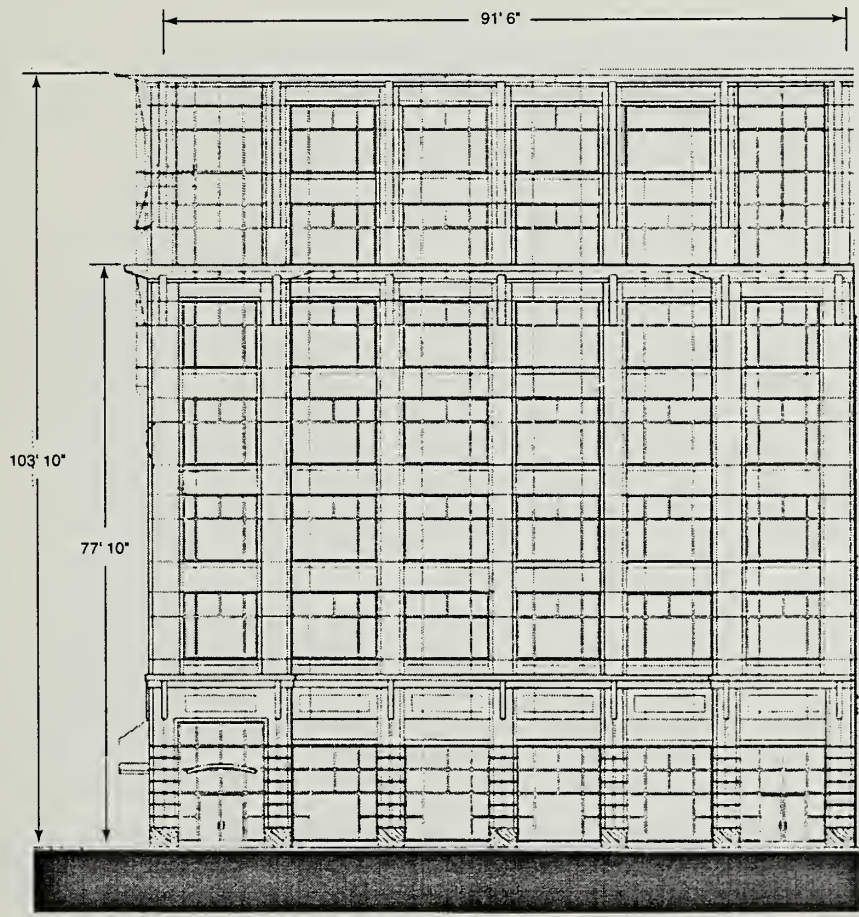
The project would provide approximately 1,550 square feet of open space required by the *City Planning Code* in the form of widened sidewalk "bulbs" on both sides of Front Street south of Sacramento Street. This would result in the elimination of approximately eight on-street loading spaces (yellow zones) on Front Street, four on each side of Front. (See the discussion of freight loading on p. 55.)

A full basement would be constructed. Excavation would be to a depth of approximately 15 feet over the entire site, with limited additional excavation up to about three feet in depth for grade beams, pile caps and footings. A total of about 5,400 cu. yd. would be excavated. About 200 piles would be driven, using pre-drilled holes if feasible.

The existing buildings on the project site contain approximately 13,500 gross sq. ft. of former retail and office space, including a partial mezzanine in each building. Thus, the net increase in floor area would be approximately 79,200 gross sq. ft. As the existing buildings on the project site are vacant, no existing uses would be displaced; for this same reason, all construction on the site is considered "net new" for purposes of this report.

Each of the two existing structures on the site is about 32 feet tall and each is constructed of unreinforced masonry (brick). Both buildings are designated Category IV - Contributory

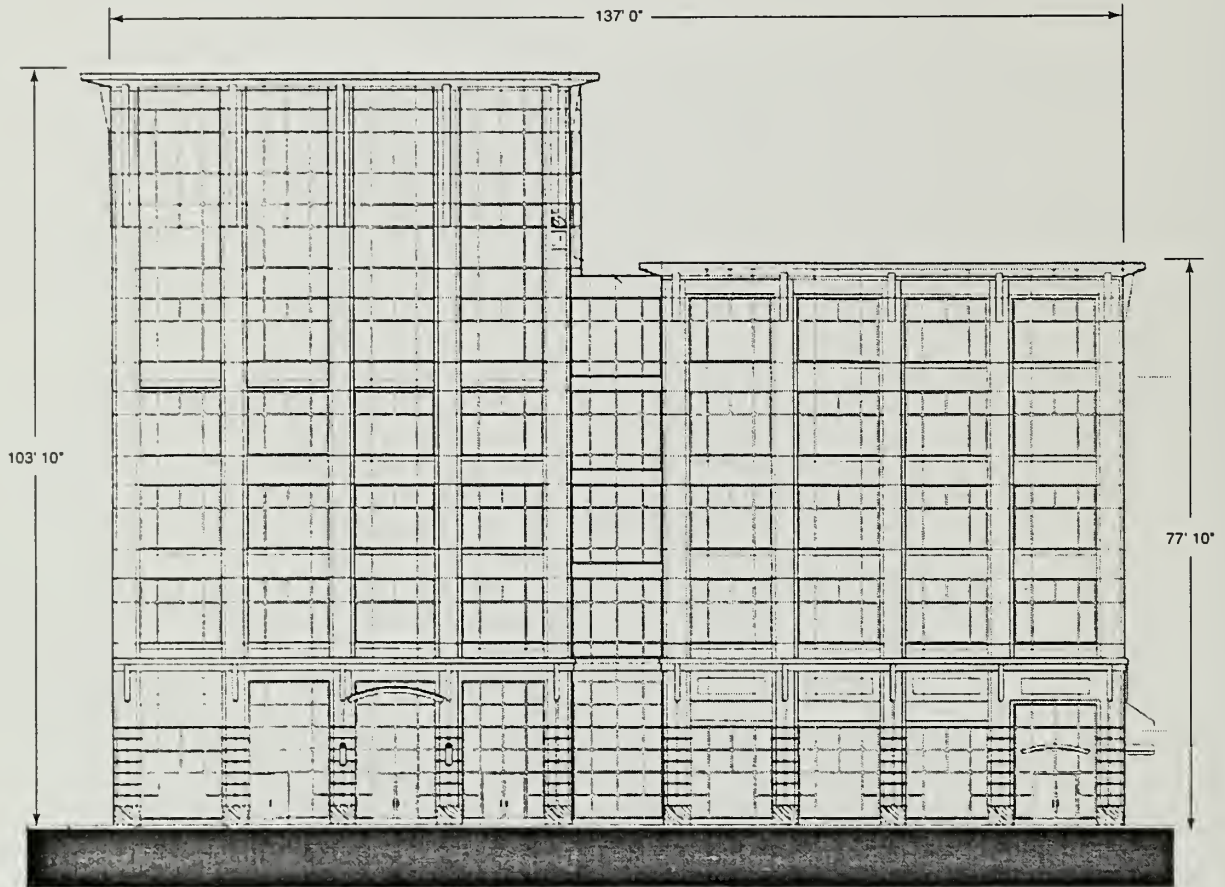
² The phased development concept is intended to allow for construction of the upper (primarily office) stories when there is a market for that space. It is possible that the entire seven-story building could be built at once. Regarding the allocation of space within the proposed building, the sponsor has indicated that the ground floor would be occupied by retail space and the upper five stories by office space. The second floor could be retail or office space, and is analyzed herein as retail space for a conservative analysis of transportation-related effects. However, because the second floor might ultimately be used for office space, the project is assumed, for a conservative analysis of planning requirements, to consist of six stories of office space for purposes of certain *City Planning Code* and *City Administrative Code* sections that apply to office development. Alternative square footage totals for retail and office space are indicated in Note "b" in Table A, p. 19. See the discussion of Compatibility with Existing Zoning and Plans, p. 52.



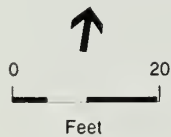
SOURCE: Heller Manus Architects

Case No. 93.543E & 96.643E: 246-250 Front Street ■

Figure 3A
Front Street Elevation



SACRAMENTO STREET



SOURCE: Heller Manus Architects

Case No. 93.543E & 96.643E: 246-250 Front Street ■

Figure 3B
Sacramento Street Elevation

Buildings under Article 11 of the *City Planning Code*, which addresses preservation of buildings and districts of architectural, historical, and aesthetic importance in the C-3 (Downtown Commercial) zoning districts.³ Both buildings are also within the Front-California Conservation District. Immediately adjacent to the project site is 236-240 Front Street (Schroeder's Restaurant), which is also designated a Category IV - Contributory Building and is within the conservation district.

The project site is within a C-3-O (Downtown Office) Use District and within a 75-X and a 350-S Height and Bulk District (75- and 350-foot maximum height limits). Office and retail is principal permitted uses in the C-3-O district and the project would be within the height and bulk limits of the 75-X district. The project floor area ratio (FAR) of 5.9:1 would be within the permitted FAR of 9:1 within the C-3-O district.

The new building would be a steel-frame structure. Exterior materials are proposed to include a combination of brick, thin-shell cast stone and other materials intended to be sympathetic to nearby historic buildings. As currently proposed, the building would have a corner entrance, with doors on both Sacramento and Front Streets to the retail space and an entrance to the office tower elevator and stair lobby on Sacramento Street. A second doorway on Front Street near the southern property line would serve the mezzanine retail storage area and the basement.

Based on a geotechnical report prepared for the project, the new building would be constructed on pre-drilled piles linked by grade beams, which are a grid of steel-reinforced concrete beams. Some existing wood piles beneath the existing structures could remain. As noted above, excavation to a depth of about 15 feet would be required over the entire site, including where the existing buildings have basements about 10 feet deep. Further excavation would be required up to a depth of about three additional feet to accommodate grade beams and pile caps.

Project construction would take about 18 months, including demolition of the existing structures and the parking lot, with occupancy planned for the second calendar quarter of 1999.

³ Article 11 of the *City Planning Code* classifies buildings in the C-3 Districts (generally, Downtown) within five Categories, as established in the Downtown Plan element of the *San Francisco General Plan*. Category I and II buildings are called "Significant Buildings" and, in general, may not be demolished unless it can be demonstrated that they have no substantial market value or reasonable use, after taking into account costs of rehabilitation and any development rights transferred to another site. Category III and IV buildings are called "Contributory Buildings," and their retention is encouraged, but not required, as discussed in Chapters III and IV of this report. Category V buildings are "unrated."

Construction cost, including demolition, is estimated at \$7 million (1996 dollars). The project architect is Heller Manus Architects.

B. PROJECT SPONSOR'S OBJECTIVES

The project sponsor seeks to replace the existing buildings on the project site with a larger, economically viable and seismically safer structure that would provide Class A office space, with usable and efficient floor plates, in response to increased demand for such space in downtown San Francisco. The sponsor also seeks to develop the maximum uninterrupted retail floor area on the project site in order to maximize the potential for retail leasing of the ground floor (and second story, if used for retail).

C. PROJECT APPROVAL REQUIREMENTS AND GENERAL PLAN POLICIES

This EIR will undergo a public comment period as noted on the cover, including a public hearing before the City Planning Commission on the Revised Draft EIR. Following the public comment period, responses to written and oral comments will be prepared and published in a Draft Summary of Comments and Responses document. This Revised Draft EIR will be modified as appropriate and presented to the City Planning Commission for certification as to accuracy, objectivity, and completeness. Certification of the EIR may be appealed to the Board of Supervisors. No approvals or permits may be issued before the Final EIR is certified.

The proposed project would require demolition and building permits from the Department of Building Inspection. In addition, because it would involve demolition of two Contributory Buildings within the Front-California Conservation District, the project would require approval per Section 1112.1, Demolition of Buildings in Conservation Districts, and Section 1112.2, Disposition of Applications to Demolish Contributory Buildings and Unrated Buildings in Conservation Districts. The Zoning Administrator has indicated that prior to approval per *City Planning Code* Section 1112.2, he would seek the advice of the Landmarks Preservation Advisory Board, and that a public hearing would be held before that body. (The Landmarks Board held two public hearings on the prior project and recommended against project approval.⁴)

The project would require review and approval under Section 309 of the *City Planning Code*, Permit Review in C-3 Districts, which governs the review of project authorization and building

⁴ Landmarks Preservation Advisory Board, Resolution No. 492, approved September 4, 1996.

and site permit applications in the C-3 Districts. Under Section 309, exceptions may be granted to certain requirements of the *City Planning Code*. The project would require an exception to the freight loading and service vehicle space requirements of Section 154, in that it would provide two off-street service vehicle spaces (for van-type vehicles) but would not provide any off-street (truck) freight loading spaces. (As defined in the *Code*, freight loading spaces are larger than service vehicle spaces). Transportation effects, including loading impacts, are discussed in Section IV.C, Effects Found Not to be Significant; see p. 54. Section 309 permits the imposition of certain conditions in regard to a project's siting and design; view, shadow and wind characteristics; parking, traffic and transit effects; energy consumption; pedestrian environment; and other matters, including issues concerning new construction and alteration within conservation districts.

The project, as a building devoted predominantly to office use, would be required to provide one square foot of open space per 50 gross square feet of office and retail space, as required by *City Planning Code* Section 138(b). The sponsor proposes to meet this requirement by creating widened "bulbs" with seating areas on the east and west Front Street sidewalks, near Sacramento Street. The project would provide street trees and sidewalk improvements, as required by Section 138.1. The project would not shade any open space protected by *City Planning Code* Section 295, and would add minimal shading to the podium level of Embarcadero Center, consistent with Section 147. Please see p. 57 for a discussion of shadow impacts. As required by Section 149, the project sponsor would devote one percent of the project construction cost to provision of public art. The project would be subject to the regulations concerning the annual limit on office construction (Secs. 321 and 322).^{4a} In addition, the project sponsor would pay the following fees required of downtown office developments:^{4b} Downtown Park Special Fund fee (Sec 139(c)); Office Affordable Housing Production Program fee (Sec. 313ff); and child care facilities fee (Sec. 314ff). The project would also be subject to the Transit Impact Development Fee (Ordinance 224-81, *San Francisco Administrative Code* Section 38). Because the project would be less than 100,000 gross sq. ft., it would not be required to provide a transportation demand management program (Sec. 163) or a local employment program (Sec. 164). The *City*

^{4a} The project would be subject to the Office Growth Limitation Ordinance (Ord. No. 414-85, as amended by Proposition M). However, there is only one other office project pending approval (One Second Street, Case No. 91.215BX), and the two projects together would construct total office square footage that is well below the annual limitation on square footage of office construction.

^{4b} As noted in the Project Description, the second floor is assumed to be developed as retail space for a conservative analysis of transportation-related effects and is assumed to be developed as office space, for a conservative analysis of planning requirements described herein.

Planning Code also requires that a project not cause ground-level winds to exceed certain standards (Sec. 148). Please see Section IV.C, Effects Found Not to be Significant, p. 57 for a discussion of wind effects.

The City Planning Commission would hold a public hearing to consider the project applications under Sections 309 and 322, including requests for exceptions under Section 309(e), and would adopt a motion approving, approving with conditions, or disapproving the project. If the project were approved by the City Planning Commission, the project sponsor must obtain demolition, building, and related permits.

On November 4, 1986, the voters of San Francisco passed Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the *City Planning Code* to establish eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; maximization of earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under the California Environmental Quality Act (CEQA), or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project is consistent with the Priority Policies. The motion for the City Planning Commission will contain the analysis determining whether the project is consistent with the Priority Policies.

The *San Francisco General Plan*, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The City Planning Commission would review the project in the context of applicable objectives and policies of the *General Plan*, including the Downtown Plan, an area plan in the *San Francisco General Plan*. Some of the key objectives and policies are noted here.

Urban Design Element

- Objective 1, Policy 3, to "Recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts."
- Objective 2, Policy 4, to "Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with the environment."

- Objective 2, Policy 6, to "Respect the character of older development nearby in the design of new buildings."
- Objective 2, Policy 7, to "Recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character."

Community Safety Element

- Objective 1, to "Reduce hazards to life safety, minimize property damage and economic dislocations resulting from future earthquakes."
- Objective 2, to "Preserve, consistent with life safety considerations, the architectural character of buildings and structures important to the unique visual image of San Francisco."
- Objective 2, Policy 1, to "Retain the architectural design character of buildings and structures in the renovation work required for abatement of hazards to life safety."

Downtown Plan Element

- Objective 1, Policy 1, to "Encourage development which produces substantial net benefits and minimizes undesirable consequences. Discourage development which has substantial undesirable consequences which cannot be mitigated."
- Objective 2, Policy 1, to "Encourage prime downtown office activities to grow as long as undesirable consequences of such growth can be controlled."
- Objective 2, Policy 2, to "Guide the location of office development to maintain a compact downtown core and minimize displacement of other uses."
- Objective 3, Policy 4, to "Limit the amount of downtown retail space outside the retail district to avoid detracting from its economic vitality."
- Objective 3, Policy 5, to "Meet the convenience needs of daytime downtown workers."
- Objective 5, to "Retain a diverse base of support commercial activity in and near downtown."
- Objective 5, Policy 1, to "Provide space for support commercial activities within the downtown and in adjacent areas."
- Objective 9, to "Provide quality open space in sufficient quantity and variety to meet the needs of downtown workers, residents, and visitors."
- Objective 9, Policy 1, to "Require usable indoor and outdoor open space, accessible to the public, as part of new downtown development."

- Objective 9, Policy 2, to "Provide difference kinds of open space downtown."
- Objective 9, Policy 4, to "Provide a variety of seating arrangements in open spaces throughout downtown."
- Objective 9, Policy 5, to "Improve the usefulness of publicly owned rights-of-way as open space."
- Objective 10, to "Assure that open spaces are accessible and usable."
- Objective 10, Policy 4, to "Provide open space that is clearly visible and easily reached form the street or pedestrian way."
- Objective 10, Policy 5, to "Address the need for human comfort in the design of open spaces by minimizing wind and maximizing sunshine."
- Objective 12, to "Conserve resources that provide continuity with San Francisco's past."
- Objective 12, Policy 1, to "Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development."
- Objective 12, Policy 3, to "Design new buildings to respect the character of older development nearby."
- Objective 13, Policy 1, to "Relate the height of buildings to important attributes of the city pattern and to the height and character of existing and proposed development."
- Objective 14, Policy 1, to "Promote building forms that will maximize the sun access to open spaces and other public areas."
- Objective 14, Policy 2, to "Promote building forms that will minimize the creation of surface winds near the base of buildings."
- Objective 15, Policy 1, to "Ensure that new facades relate harmoniously with nearby facade patterns."
- Objective 15, Policy 3, to "Encourage more variation in building facades and greater harmony with older buildings through use of architectural embellishments and bay or recessed windows."
- Objective 16, Policy 1, to "Conserve the traditional street to building relationship that characterizes downtown San Francisco."
- Objective 16, Policy 2, to "Provide setbacks above a building base to maintain the continuity of the predominant streetwalls along the street."

- Objective 16, Policy 3, to "Maintain and enhance the traditional downtown street pattern of projecting cornices on smaller buildings and projecting belt courses on taller buildings."
- Objective 16, Policy 4, to "Use designs and materials and include activities at the ground floor to create pedestrian interest."
- Objective 16, Policy 5, to "Encourage the incorporation of publicly visible art works in new private development and in various public spaces downtown."
- Objective 21, Policy 1, to "Provide off-street facilities for freight loading and service vehicles on the site of new buildings sufficient to meet the demands generated by the intended uses. Seek opportunities to create new off-street loading for existing buildings."
- Objective 21, Policy 2, to "Discourage access to off-street freight loading and service vehicle facilities from transit preferential streets, or pedestrian-oriented street and alleys."
- Objective 23, to "Reduce hazards to life safety and minimize property damage and economic dislocations resulting from future earthquakes."
- Objective 23, Policy 2, to "Initiate orderly abatement of hazards from existing buildings and structures, while preserving the architectural and design character of important buildings."

III. ENVIRONMENTAL SETTING (1995 Draft EIR p. 17)

A. ZONING AND LAND USE (1995 Draft EIR p. 17)

The project site is within the C-3-O (Downtown Office) Zoning District. Most of the project site is also within the 75-X Height and Bulk District, while the eastern portion of the site is within the ~~300-~~ 350-S Height and Bulk District. The 75-X District permits buildings up to 75 feet in height, with no restrictions on bulk. The ~~300-~~ 350-S District permits buildings up to ~~300~~ 350 feet in height, with setbacks (generally above 50 feet), and applies primarily to highrise structures. Figure 3C shows the height and bulk districts in the project vicinity. The C-3-O District permits a wide variety of commercial land uses, including convenience retail. The *City Planning Code* regulates land uses, but does not distinguish between uses based on the identity of the operator (e.g., whether the operator is an individual owner or corporate chain).

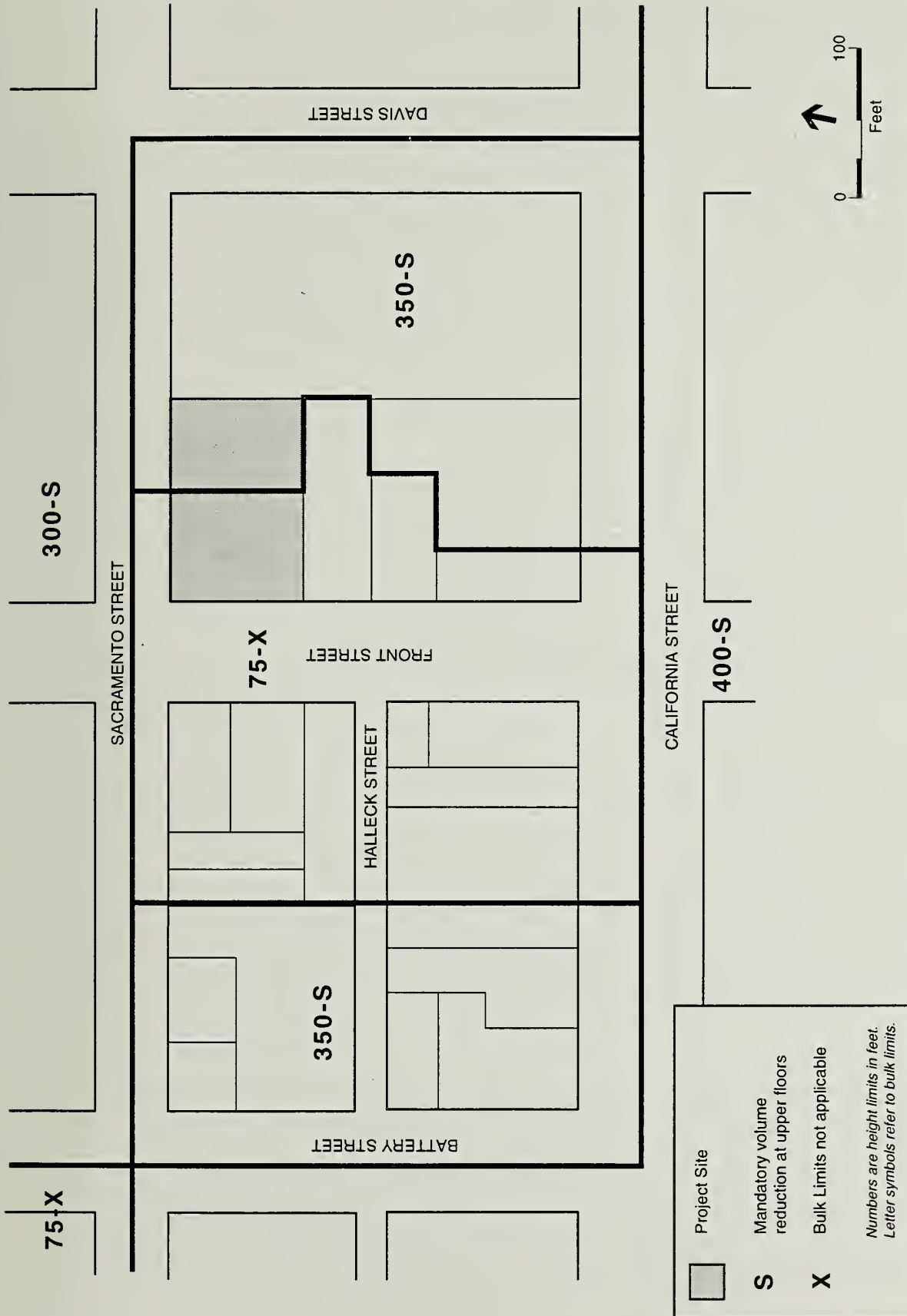
Most of the project site is also within the Front-California Conservation District, established under Article 11 of the *City Planning Code*, which provides for review of alteration and demolition of buildings within the District, but does not regulate land uses.

The two buildings on the project site are vacant; they were most recently used for ground-floor restaurants with offices on the second story. The site also includes a parking lot, not in use, and a vacant building site. Land use in the project vicinity is primarily devoted to offices in highrise structures, many of which contain ground-floor retail space. In the immediate site vicinity, along Front, Battery, California, Sacramento and Halleck Streets (within the Front-California Conservation District), smaller buildings predominate. These buildings also have ground-floor retail and restaurant uses, and many have offices above these ground-floor uses. The Embarcadero Center Two highrise office development, across Sacramento Street from the project site, includes retail and restaurant uses on the ground floor and mezzanine level.

B. HISTORIC ARCHITECTURAL RESOURCES (1995 Draft EIR p. 17)

RATING BUILDINGS OF ARCHITECTURAL AND HISTORIC IMPORTANCE

The project site is in the area covered by the Downtown Plan, which is an area plan within the San Francisco *Master Plan*. Article 11 of the *City Planning Code*, which addresses preservation



Case No. 93.543E & 96.643E: 246-250 Front Street

Figure 3C

Planning Code
Height and Bulk Districts

SOURCE: Environmental Science Associates; San Francisco Planning Department

of buildings and districts of architectural, historical, and aesthetic importance, classifies buildings in the C-3 Zoning Districts (generally, Downtown) within four Categories, I through IV, as established in the Downtown Plan. The Downtown Plan identified the most important buildings, called "Significant Buildings," as Category I and Category II buildings. Under the Downtown Plan and Article 11, these structures are Buildings of Individual Importance, are at least 40 years old, and are rated Excellent in Architectural Design or Very Good in both Architectural Design and Relationship to the Environment, with the difference between Category I and Category II being in the extent of alteration allowed. The Downtown Plan identified a second tier of structures, called "Contributory Buildings," as Category III and Category IV buildings. Under the Downtown Plan and Article 11, among Contributory Buildings, Category III buildings are Buildings of Individual Importance, but of lesser architectural and/or contextual merit than Category I and II buildings, are at least 40 years old, and are located outside six conservation districts designated in Article 11 (see below, p. 39). Category IV buildings are located within conservation districts, are at least 40 years old, may be Buildings of Individual Importance or Buildings of Contextual Importance, and are of lesser architectural and/or contextual merit than Category I and II buildings. All remaining Downtown buildings are unrated, Category V.^{4c}

The Downtown Plan calls for preservation of Category I and II buildings and encourages, but does not require, preservation of Category III and IV buildings. To this end, one of the primary tools employed in the *City Planning Code* is the Transfer of Development Rights, which allows a property owner of a historic building to transfer to another site the allowable development envelope under the *City Planning Code* that is not fully occupied by the smaller historic building. Article 11 of the *City Planning Code*, in general, prohibits demolition of Category I and II buildings (and Category III and IV buildings from which development rights have been transferred) unless it can be demonstrated that the buildings have no substantial market value or reasonable use, after taking into account costs of rehabilitation and any development rights transferred. Demolition of Category III and IV buildings from which no development rights

^{4c} While the ratings of Category I through IV buildings under the Downtown Plan and Article 11 of the *City Planning Code* are determined by their Architectural Design and Relationship to the Environment, they are also, by definition, historic buildings. For example, the standards in Article 11 (Sec. 1102) require that Category I through IV buildings be "at least 40 years old," while the Downtown Plan describes rated buildings in the Plan's section entitled, "Preserving the Past." In assigning a summary numerical rating to each building, from which was derived a determination of "Individual" or "Contextual" Importance, the Downtown Plan evaluators also assigned a score for History, along with Architecture, Environment, and Integrity.

have been transferred is generally permitted under Article 11. Transfer of development rights is not proposed as part of the project.

The Downtown Plan architectural survey assigned each building a numerical score for 13 categories in four headings that are based on criteria of the National Trust for Historic Preservation: architecture, history, environment and integrity.⁵ The survey also collected planning data such as zoning and floor-area ratio and submitted the information to a five-member review committee that assigned each building to one of the five categories. Both of the existing on-site buildings are designated Category IV - Contributory Building, and no development rights have been transferred from either building.

The two buildings on the project site each scored 28 points in the Downtown Plan survey, which is within the 20 to 44 point range for "contextual importance." The buildings received identical scores on all categories except Design Integrity, where the northerly building, at 248-250 Front Street (hereinafter referred to as "250 Front") was rated Excellent, and the building at 244-246 Front Street (referred to as "246 Front"), Very Good, most likely on the basis that 250 Front retains its original second-floor windows, while 246 Front does not. The buildings were rated Good or higher in style, construction, age, design quality and relationship to the environment. They were rated lower in importance of design architect, interior, setting, and landmark. The buildings were not rated of "individual importance."

The Foundation for San Francisco's Architectural Heritage also surveyed downtown structures and, in 1979, published the results in the book *Splendid Survivors*. (The Heritage survey used the same 13 rating categories that were later adopted for the Downtown Plan survey; the particular form of the Heritage survey was based on a model put forth by Harold Kalman in his book *The Evaluation of Historic Buildings, A Manual*, published by the Canadian government in 1978.) Summary ratings from "A" to "D" were assigned to each building on the basis of evaluation in the 13 rating categories, with "A" representing buildings of Highest Importance. "B"-rated buildings are of Major Importance, "C"-rated buildings are of Contextual Importance, and "D"-rated structures are of Minor or No Importance. Buildings not rated by Heritage are those that have been built or suffered insensitive exterior remodelings since 1945. The existing

⁵ The 13 categories are essentially those used by the Foundation for San Francisco's Architectural Heritage in its book *Splendid Survivors*: "Architecture" (Style, Construction, Age, Architect, Design, Interior); "History" (Person, Event, Patterns); "Environment" (Continuity, Setting, Landmark); and "Integrity." (See the discussion of the Heritage Survey on p. 33 in the main text.)

buildings on the project site were rated C - Contextual Importance in *Splendid Survivors*. The full *Splendid Survivors* description of "C"-rated buildings is as follows:

- C. Contextual Importance. Buildings which are distinguished by their scale, materials, compositional treatment, cornice and other features. They provide the setting for more important buildings and they add visual richness and character to the downtown area. Many C-group buildings may be eligible for the National Register as part of historic districts.

Between 1974 and 1976, the San Francisco Planning Department conducted a citywide survey of architecturally significant buildings, rating approximately the best 10 percent of San Francisco's buildings from a low "0" to a high of "5." The inventory assessed the architectural significance of the surveyed structures from the standpoint of overall design and particular design features. Both contemporary and older buildings were included, but historical associations were not considered. Each building was given two numerical ratings, one for architectural quality and one for overall architectural significance, urban design context, and environment significance. (The latter rating is most commonly referred to.) The ratings ranged from a low of "0" to a high of "5." The architectural survey resulted in a listing of the best 10 percent of San Francisco's buildings. In the estimation of the inventory participants, buildings rated "3" or higher represent approximately the best two percent of the City's architecture. The buildings on the project site were not rated in the 1976 citywide survey.

The following is added as a new subsection, immediately prior to the subsection entitled "Project Site":

UNREINFORCED MASONRY BUILDING ORDINANCE

In 1993, the City adopted the Unreinforced Masonry Building (UMB) Seismic Retrofit Program with the primary goal of reducing earthquake-related life safety hazards associated with the approximately 2,100 UMBs in San Francisco. Among the other goals of the program is protection and retention of existing UMBs with architectural merit. The program includes adoption of Architectural Guidelines for retrofit of UMBs. The City Planning Code expressly recognizes these guidelines in Section 1111.1, which declares that an alteration of a Significant or Contributory Building under Article 11, or of a building in a Conservation District, shall not be considered a Major Alteration if:

The sole purpose and effect of the alteration is to comply with the UMB Seismic Retrofit Ordinances and the Zoning Administrator determines that the proposed work complies with the UMB Retrofit Architectural Design Guidelines. . . .

The San Francisco Department of Building Inspection has compiled a list of approximately 2,090 unreinforced masonry buildings (UMBs) in the city. Of these, about 1,675 are subject to the Unreinforced Masonry Building Ordinance, which was passed in 1992, and which requires that these buildings be seismically strengthened by a deadline (from 1997 to 2006) that is based on the "risk level" to which each building is assigned. Of the 1,675 buildings, about 235 have been upgraded and another 245 are under renovation. Upgrading plans for about 140 additional buildings are under review by the Department of Building Inspection. Twenty buildings have received extensions of time for compliance, and about 60 buildings have been demolished.^{5a,5b}

Appendix B describes an evaluation of the existing buildings on the project site in the context of strengthening that would be required to comply with the UMB Ordinance.

PROJECT SITE⁶

Building History

The two structures on the project site are simple unreinforced brick two-story commercial structures typical of the immediate post-1906 construction in the area. The northerly building, 250 Front, was constructed in 1909, while the building at 246 Front was constructed in 1913. Both structures were built by P. J. Walker Construction Company, a well-known early 20th century construction firm founded by Oakland native Percival John Walker in 1895. P. J. Walker Construction Company built the Old Federal Reserve Building, the Shell Building, and

^{5a} The remaining 358 UMBs are exempt from the ordinance for varying reasons: 104 were strengthened prior to adoption of the ordinance; 66 are residential buildings of fewer than five units; 15 are subject to the separate provisions of the Field Act, which governs public school facilities; and 173 buildings on the Department of Building Inspection list of UMBs have been determined to consist of brick infill within steel or concrete frame walls.

^{5b} Rodekuhr, Christ, Building Inspector, San Francisco Department of Building Inspection, Unreinforced Masonry Building Program, facsimile transmission, February 13, 1997.

⁶ Information on the history and architecture of the existing buildings is excerpted from a Historic Resources Assessment prepared by Page & Turnbull, Inc. A copy of this assessment is available for public review in the project case file at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

the Clift Hotel in San Francisco; Giannini and Bowles Halls on the University of California, Berkeley, campus; the Hotel Oakland; and several major buildings in Los Angeles.

The architect for 246 Front was H. K. Lovell (presumed to be Hiram K. Lovell, in 1909 a draftsman in the San Francisco firm of Woollett and Woollett). Hiram Lovell is credited with design of the Lorin Theater at 3332 Adeline Street in Berkeley (1914), as well as homes at 1151 Oxford Street and 1809 Euclid Avenue, both also in Berkeley. The original owner of 246 Front was apparently Catherine Dunn, widow of architect James Francis Dunn.

No architect is recorded in the plans of 250 Front. The original owner of 250 Front was Leon Bocqueraz, a California native educated in Paris who was a leader in San Francisco's French immigrant community and a top executive with the French American Bank, later purchased by A. P. Giannini as part of the growth of the Bank of America.

Building Construction and Condition

The project site buildings are essentially identical, with the primary exterior difference being that 250 Front retains its original wood upper-story window frames, while 246 Front has more modern metal-frame windows. The original wood ground floor storefronts in both buildings have been replaced with aluminum.

The Front Street facades of both buildings are of yellow brick, with simple two-part architecture consisting of a ground floor storefront flanked on either side by rusticated pilasters (rectangular "columns" that project outward from the facade). The second story of each building has a pair of double-hung windows, with pilasters on each side of the facade. Between the ground floor and second story is a belt course made up of two wood moldings. A simple wood frieze and denticulated cornice with a brick parapet above completes the street wall. Exterior walls other than the Front Street facade are of red brick, with windows and a fire escape door (added after original construction) in each rear wall. Figure 4 shows the building facades.

The interior of each building consists of a full basement extending beneath the sidewalk in the form of a vault, a first floor with partial mezzanine, and a second story. The buildings are joined through an opening in the ~~party two adjacent~~ walls at the second floor, but are not otherwise connected. The original building plans show no major interior partitions in either building, although numerous remodelings have apparently occurred since the buildings were constructed. Vertical circulation consists of stairways between the basement and first floor and between the



A. Existing Buildings on Project Site



B. East Side of Front Street Between Sacramento and California Streets

SOURCE: Environmental Science Associates.

Case No. 95.343E & 96.643E: 246-250 Front Street ■

Figure 4
Project Site and Nearby Buildings

first floor and mezzanine in each building; 250 Front also has a stair from the street to the second floor. An inoperable elevator exists in 246 Front Street. While an elevator was shown in the original plans for 250 Front, no elevator exists now.

Both buildings have concrete foundation walls in the basement and are built on piles, presumably wood. Floor and roof framing consists of pine planking and 2x14 and 3x14 Oregon pine joists spanning the entire interior, with no intermediate posts. The original interior walls were apparently finished with tongue-and-groove paneling, although none exists today. The exposed interior face of the brick exterior walls is the only apparently original material visible on the interior walls.

The building exteriors appear to be in generally good condition, with the need for a repair and upgrade program including painting and limited repair and replacement of components such as trim and windows. The Front Street brick face of each building has apparently been sandblasted.

A former property owner in 1986 filed a request with the Department of City Planning for reconsideration of the Category IV ratings of the two buildings on the basis of alteration and sandblasting of the Front Street facades. City planning staff stated at the time that the alterations were not substantial enough to warrant lowering the rating for integrity from Very Good to Good and that, even if such action were taken, the buildings would still meet the Category IV criteria. Although the stability of the brick does not appear to have been lost, the project sponsor's architect has stated that "the buildings show serious evidence of cracking and stress in the masonry" and that "the brick has lost its protective face and will inevitably deteriorate. It is not salvageable in the long term." The project sponsor's architect has further stated:

the exteriors are substantially compromised. The replacement of the original fenestration with common aluminum storefronts leaves the buildings devoid of architectural detail.⁷

In contrast to this statement, a historic resources assessment prepared by Page & Turnbull to evaluate the buildings and their role in the Front-California Conservation District concludes that the buildings' ratings remain applicable:

⁷ Heller, Jeffrey, FAIA, Heller Manus Architects, letter to Harry O'Brien, Coblenz, Cahen, McCabe & Breyer, October 23, 1995.

All information about the structures indicates they are exactly what the Category IV definition says: not of high architectural quality (or historical associations) but contributors to the quality of an area that contains a number of highly rated buildings.⁸

As also noted, the two buildings on the project site were rated C - Contextual Importance in *Splendid Survivors*. Although C-rated buildings may generally be eligible for listing on the National Register of Historic Places and the California Register of Historic Resources as part of a district, the two buildings proposed for demolition would not likely meet the criteria for listing as City landmarks or for individual listing on the National Register or California Register.⁹

FRONT-CALIFORNIA CONSERVATION DISTRICT

The Downtown Plan, an area plan in the San Francisco Master Plan, identified areas of downtown as having concentrations of buildings worthy of particular recognition as districts.

Certain sections of downtown have concentrations of buildings that together create geographic areas of unique quality. In these areas, buildings of a somewhat lesser quality than those required to be retained take on an increased importance. These buildings help create a setting that reinforces and complements the qualities of the more significant structures in the area, and their own attributes are more apparent and appreciated.¹⁰

Most of the project site is within the Front-California Conservation District, one of six such districts defined under Article 11 of the *City Planning Code*.¹¹ Article 11 defines conservation districts as areas containing "substantial concentrations of buildings that together create subareas

⁸ Page & Turnbull, Inc., Historic Resources Assessment, 246, 250 Front Street, December 19, 1995, p. 10. A copy of this assessment is available for public review in the project case file at the San Francisco Planning Department, 1660 Mission Street, San Francisco. In regard to the sandblasting of the exteriors, Page & Turnbull concludes that, while treatment with consolidants and water repellents is required to restore the brick's water resistance, sandblasting does not necessarily lead inexorably to the loss of the facade (Frederic Knapp, Page & Turnbull, Inc., letter to Karl F. Heisler, Environmental Science Associates, December 19, 1995).

⁹ Page & Turnbull, Inc., op. cit., p. 10.

¹⁰ San Francisco Master Plan, Downtown Area Plan, p. II.1.25.

¹¹ The project site, Lot 18 of Assessor's Block 236, was formed by the merger of what at one time were four separate parcels (Lots 9, 10, 11 and 16). The western portion of the site, containing the two existing buildings and the vacant building site, is within the Front-California Conservation District, while the eastern portion (the former Lot 16) is not within the Conservation District.

of special architectural and aesthetic importance. Such areas shall contain substantial concentrations of Significant and Contributory Buildings and possess substantial overall architectural, aesthetic or historic qualities justifying additional controls in order to protect and promote those qualities" (*City Planning Code*, Sec. 1103). There is no specified *City Planning Code* criterion for the minimum number or percentage of rated buildings in a conservation district. The designation as a conservation districts generally does not restrict uses in buildings within a district; it does impose certain restrictions on signs (Sec. 1111.7).

Article 11, Appendix H, describes the Front-California Conservation District. The basic nature of the District is found in the "low height and small scale" of its buildings, which is in "contrast to the rest of the financial district and the adjacent Embarcadero Center." In particular, "the low buildings on Front Street and the narrow lot widths create an open, sunlit streetscape" that favors pedestrian activity (Appendix H, Sec. 5(b)).

The District, unlike other conservation districts of more uniform height, is characterized by buildings of varying heights, from one to 11 stories, "allowing sunlight to penetrate the street most of the day" (Appendix H, Sec. 6(a)). Facade materials include exposed brick, stucco, metal, and terra cotta panels in colors that include white, grey masonry and terra cotta, red brick, and deep reds and greens (Appendix H, Sec. 6(b)). Building styles range from utilitarian brick industrial with decorative brickwork [like the buildings on the project site] to ornate Renaissance Revival (Appendix H, Sec. 6(c)). The Front-California Conservation District is illustrated in Figure 1, p. 15, and Figure 5, p. 45.

Buildings on California Street range from two to 11 stories and average about six stories. Of the six buildings on California Street between Front and Battery Streets, four are rated Category I or II, including City Landmark No. 145 (Buich Building, 240 California Street), making the block a rare display of fine historic buildings, particularly for the downtown office core. The buildings on Front Street are "lower and of lesser quality than the California Street buildings" (Appendix H, Sec. 5(c)); the Front Street buildings are much simpler, mostly retail storefronts with one or two stories of office or storage space above. The presence of Halleck Street between Battery and Front Streets limits the depth (and consequently the mass) of the California Street block and breaks up the western side of Front Street, adding to the small scale character of the District.¹²

¹² Page & Turnbull, Inc., op. cit., p. 12.

The District was at the center of San Francisco in the Gold Rush, with land developing quickly as water lots were filled in between the long piers in Yerba Buena Cove, which originally extended as far west as Montgomery Street. The block of Front Street where the project is located achieved its greatest notoriety as the site of "Fort Gunnybags," established by the Vigilance Committee of 1856 on the portion of the project site that now consists of an empty building site. A plaque marking the former site of Fort Gunnybags was placed on the site in 1903; it currently is mounted on a small concrete pillar in the empty portion of the project site. As the years passed, prominent businesses moved toward Market Street and small-scale commerce intensified in the area around California and Front Streets until the entire area was destroyed in the 1906 earthquake and fire.¹³

The years immediately after the fire are the period of significance of the District. Its redevelopment exhibits the influences of nearby office buildings from Market to Battery Streets, west and south of the District, and smaller commercial and waterfront-serving buildings to the east. In addition to offices, the activities in the area containing the project site in 1913 included a coffee and spice mill, a printer, a typesetter, a tent and bag factory and a lubricating oils supplier.¹⁴

The thematic cohesion of the District comes from the preponderance of two related building types from the post-1906 period: small commercial buildings, concentrated on Front Street, and mid-size office buildings, concentrated on California Street. The District is particularly notable for its concentration of post-1906 buildings that are relatively unchanged in a setting amidst modern highrise office towers. The nearest notable grouping of historically valuable structures is one and a half blocks east on Drumm Street, where Nos. 17-21 and 23-29 were rated "4" in the Planning Department survey and No. 33 is a Category III building under Article 11 and has been determined eligible for the National Register of Historic Places.¹⁵ There are also three other conservation districts to the northwest and southwest of the project site (see p. 47).

¹³ Page & Turnbull, Inc., op. cit., p. 11.

¹⁴ Page & Turnbull, Inc., op. cit., p. 11.

¹⁵ Page & Turnbull, Inc., op. cit., p. 12.

The following section is newly added to the end of Chapter III:

C. URBAN DESIGN AND VISUAL QUALITY (not included in 1995 Draft EIR)

The two existing buildings on the project site are each two stories in height, finished in yellow brick on the principal (Front Street) facades and red brick on the other exterior walls (see Figure 4, p. 37). The two buildings are virtually identical in design, with aluminum storefronts and a pair of second-story windows in each building. Detailing includes pilasters (rectangular columns projecting from the walls) on both levels separated by wood moldings above the ground floor. There is a brick parapet atop each building. The existing buildings are about 32 feet in height.

As noted in the discussion of Historic Architectural Resources, the project site is within the Front-California Conservation District, an approximately one-and-one-half square block area of buildings that are substantially shorter and smaller in mass and bulk than surrounding highrise office towers. The relatively modest size of the buildings in the immediate project site vicinity recalls the scale and character of San Francisco's pre-1906 commercial core, and allows for more sunlight than is common in downtown San Francisco.

Building materials in the project vicinity are generally traditional "warm" materials such as stone and red and yellow brick, although there are also structures of reinforced concrete. Like building massing, these materials also contrast with those of surrounding newer development, generally of glass, steel, concrete, and concrete or stone panels. Windows in the Conservation District's older buildings tend to be recessed in thick masonry walls, resulting in shading around window cuts, compared to the flush fenestration common in newer construction. Ornamentation in the older buildings is typically more detailed, consisting of belt courses above one- or two-story building bases, cornices at the roof line, and well-defined pilasters or columns, while newer structures generally have flatter exterior surfaces and little differentiation of building bases.

Of the other buildings on the east (project) side of Front Street, the adjacent Schroeder's Building is approximately 64 feet tall and the recently constructed (1987) building at 222 Front Street is about 80 feet tall. Buildings on the opposite (west) side of Front Street range from one to five stories, about 20 feet to about 70 feet. Buildings on Front Street, including the three newest buildings, are constructed to the lot lines, without setbacks at ground level. There is a widened sidewalk at the northwest corner of California and Front Streets, constructed as publicly accessible open space (with benches for seating) as part of the Home Savings Building project at

that corner. Other open space in the immediate project vicinity consists of privately owned, publicly accessible spaces such as the podium levels at Embarcadero Center or the plaza at the base of 101 California Street. The nearest public parks are Maritime Plaza, on the podium level of the One Maritime Plaza Building, Clay Street at Front Street, one block north of the project site; Embarcadero Plaza, at Clay and Davis Streets, two blocks northeast; and Justin Herman Plaza, north of the foot of Market Street, three blocks east.

Because of their small size, the existing buildings are not visible except within the immediate vicinity. Views from the sidewalk adjacent to the project site are also limited by intervening buildings, including Embarcadero Center, which blocks the view north on Front Street. South on Front Street, the view extends to Market Street. West on Sacramento Street, the view extends to Nob Hill, and east on Sacramento Street, to the Hyatt Regency Hotel and Embarcadero Center Four.

A. HISTORIC ARCHITECTURAL RESOURCES (1995 Draft EIR p.27)

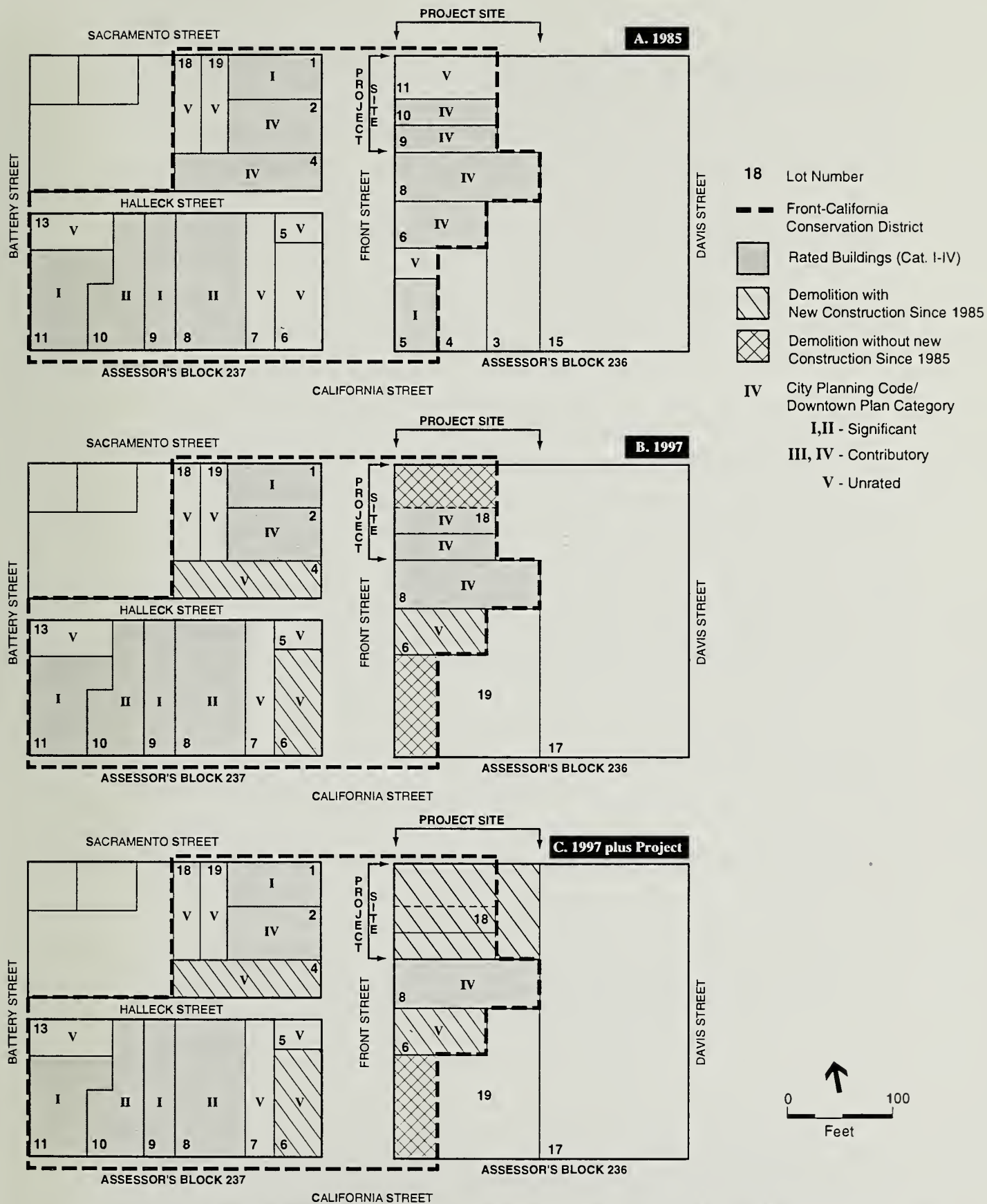
As described in the Section III.B, Historic Architectural Resources Setting, p. 30, the existing buildings on the project site are rated Category IV - Contributory Building under Article 11 of the *City Planning Code* and are rated C - Contextual Importance by the Foundation for San Francisco's Architectural Heritage.

The project proposes demolition of the existing buildings on the project site and construction of a new ~~two~~-seven-story building. Demolition would remove two buildings rated Category IV - Contributory Building under Article 11 of the *City Planning Code*. Under Section 1112.2 of the *City Planning Code*, an application for demolition of a Contributory Building in a conservation district shall be approved if a permit has been issued for a replacement structure, in accordance with Section 1113, which requires that new construction be compatible in scale and design with the conservation district. It should be noted that, under the City's Unreinforced Masonry Building Ordinance, the buildings require seismic upgrading or must be demolished.

While the effect of the project on the subject buildings themselves (demolition) is apparent, the project's potential effect on the Front-California Conservation District is less clear. The Front-California Conservation District, when originally designated under Article 11, contained 19 buildings, of which six were rated Significant Buildings (Category I and II) and six others were rated Contributory Buildings (Category III and IV).¹⁶ Figure 5A illustrates the District at the time of creation under Article 11.

The Front-California Conservation District has sustained demolitions since its creation, including the loss of two rated structures. First, 222 Front Street, a Category IV structure, was demolished and replaced with a new structure in 1987. Following the 1989 Loma Prieta earthquake, three more buildings were demolished, including 235 Front Street (across the street

¹⁶ One building, at 222 Front Street, was originally designated Category I under the Downtown Plan, but was rated Category IV under Article 11 at the time the district was adopted, apparently because of an extensive remodeling in 1967. This building has since been demolished.



SOURCE: Environmental Science Associates; San Francisco Planning Department.

Case No. 95.343E & 96.643E: 246-250 Front Street ■

Figure 5
Front-California
Conservation District

from the project site), a Category IV building that was subsequently replaced with a McDonald's restaurant. Also demolished were 158 California Street (the Marine Building), a Category I structure, and an adjacent unrated building at 150 California Street/220 Front Street. The site of those two buildings remains vacant. Figure 5B, p. 45, illustrates the current status of the District.

In conjunction with the loss of the above-noted three rated buildings, implementation of the proposed project would leave standing seven of the original 12 rated buildings in the District, including one of the original five on the east side of Front Street and three of the original eight on both sides of Front Street. Figure 5C, p. 45, illustrates the district following implementation of the project.

As noted, four of the six buildings on the north east block face of California Street are rated Category I or II; these buildings would comprise four-sevenths of the remaining rated buildings within the District following project implementation. The other remaining rated buildings would be a Category I structure at 251 Front Street at Sacramento Street, a Category IV building immediately to the south on Front Street, and a Category IV building at 236-240 Front Street (Schroeder's Restaurant), adjacent to the project site, which has been the subject of remodeling that could be considered incompatible with the building's original design.¹⁷ This last building would be the only rated structure on the east (project) side of Front Street. The east side of Front Street would thus include one historic building and two late 20th century structures, along with an empty lot at the northeast corner of California and Front Streets, for which a high-rise building was approved in 1989, and for which a subsequent application for an interim two-story-plus-basement retail structure was approved in 1996, is currently being reviewed by the Planning Department. Changes in the number and concentration (distribution) of rated buildings within the conservation district, whether attributed to past demolitions or to the proposed project, have the effect of reducing the integrity or significance of the district, and could require that justify amendment of the City Planning Code be amended to eliminate the Front-California Conservation District, or to re-draw its boundaries.¹⁸ However, it should be noted that approval of the project would not trigger a process for elimination of the conservation district or

¹⁷ Page & Turnbull, Inc., op. cit., p. 13.

¹⁸ While conservation districts are not designated solely on the basis of historic buildings, they must, by definition (Sec. 1103), include a substantial concentration of Significant and Contributory Buildings and those buildings, by definition (Sec. 1102(a) - (d)), must be at least 40 years old.

re-drawing of the district boundaries. A change in the district boundaries would require approval by the Board of Supervisors (City Planning Code Sec. 1107).

For comparison, there are five other conservation districts designated under Article 11 of the *City Planning Code*, including three within four blocks of the Front-California Conservation District. These nearby districts are the Commercial-Leidesdorff Conservation District, the Kearny-Belden Conservation District, and the Pine-Sansome Conservation District; each is slightly larger or smaller than the Front-California Conservation District, encompassing all or part of one to three City blocks. A fourth district, the New Montgomery-Second Street Conservation District, is substantially larger, covering all or part of five larger South-of-Market blocks. The fifth conservation district is the largest, the Kearny-Market-Mason-Sutter Conservation District, which includes most of the downtown retail core, covering all or part of some 35 city blocks. Table 1 presents a comparison, by category of building and number of buildings, between the Front-California Conservation District and the other districts, with the exception of the Kearny-Market-Mason-Sutter Conservation District, which because of its large size, may be seen as comprising a series of subareas. As indicated in Table 1, the Front-California Conservation District is the only one of the five districts examined to have sustained substantial losses since it was designated under Article 11. However, it should be noted that there is no specified *City Planning Code* criterion for the minimum number or percentage of rated buildings in a conservation district.

New construction in a conservation district is required to be compatible in scale and design with the district (*City Planning Code* Sec. 1113), as set forth in the applicable sections of the Article 11 appendix that describes each district. For the Front-California Conservation District, "new construction should maintain the character of both Front and California Streets by relating to the prevailing height, mass, proportions, rhythm and composition of historic buildings."

A new building on Front Street should relate to buildings that are generally less than five stories and, for a building on a large site, should visually break up its facade into discrete sections that relate to existing small building masses. Two- and three-part vertical composition should be retained (Appendix H, Sec. 7(b)(1)).

The scale of the District should be maintained by "the consistent use of size and complexity of detailing in relation to surrounding buildings." On Front Street, large wall surfaces should be broken up by detailing and textural variation. Existing patterns of windows and doors should be retained (Appendix H, Sec. 7(b)(2)). Historic materials (or compatible materials, such as

TABLE 1: CONSERVATION DISTRICTS COMPARED

Conservation District	1985 Bldgs./a/	1985 Rated Bldgs./b/	1985 Pct./c/	1997 Bldgs./d/	1997 Rated Bldgs./e/	1997 Pct./c/
Front-California /f/	19	12	63	17 (16)	9 (7)	53 (41)
Commercial-Leidesdorff	20	17	85	20	17	85
Pine-Sansome	13	13	100	13	13	100
Kearny-Belden	15	10	67	15	10	67
New Montgomery-Second	52	39	75	50	38	76
AVERAGE	24	18	76	23	17	76

NOTES:

/a/ Total Buildings at Time Districts were Designated by Article 11 of *City Planning Code*.

/b/ Rated (Category I through IV) Buildings at Time Districts were Designated by Article 11.

/c/ Percent of Total Buildings that are Rated Buildings.

/d/ Total Buildings, 1997 ~~1995~~.

/e/ Rated (Category I through IV) Buildings, 1997 ~~1995~~.

/f/ Numbers in parentheses in 1997 ~~1995~~ columns represent conditions if project were implemented.

SOURCE: Environmental Science Associates

substituting concrete for stone) should be employed; preferred materials are brick, stone and concrete simulated to look like terra cotta or stone. Traditional light colors should be used (Appendix H, Sec. 7(b)(3)). New buildings should pick up elements of detailing and ornamentation from surrounding buildings, such as belt courses on Front Street (Appendix H, Sec. 7(b)(4)).

As described in Chapter II, Project Description, the proposed new structure would be seven ~~two~~ stories (about 36-105 feet) in height, with a 5-story street wall on Front Street about 78 feet tall (including cornice). Because the uppermost 30 feet of the building would be set back 75 feet from Front Street, the Front Street facade would effectively be the building's height when viewed from street level on Front Street. The project's Front Street facade would be about 14 feet taller than the adjacent Schroeder's building and about the same height as the 1987 building at 222 Front Street. Therefore, the project would result in a street wall of similar height along the entire east side of Front Street, with the exception of the empty lot at the corner of California Street. Appendix H, Sec. 7(b)(1) states, "A setback at the predominant streetwall height can permit additional height above the setback without breaking the continuity of the streetwall." Thus, the setback would be consistent with Article 11's guidelines for new construction in the Conservation District. (For comparison, the Marine Building, which stood at the northeast

corner of Front and California Streets prior to the 1989 earthquake, was 84 feet tall.) ~~very similar to the two existing buildings and~~ The project's Front Street facade would be within the typical range of building heights within the Conservation District, ~~although the project would reduce the variation in heights on Front Street.~~ Because it would be at the northern edge of the District, the project would not substantially diminish midday sunlight on Front Street, which, as noted in the setting, is one of the characteristics of the District.

Exterior materials would include combination of brick, thin-shell cast stone and other materials intended to be sympathetic to nearby historic buildings. As shown in Figures 3A and 3B, pp. 21 and 22, the new building would be a two-part vertical composition with a belt course between the ~~first mezzanine~~ and second ~~stories~~; this would be consistent with existing buildings on Front Street. The new building would have longer street frontages than most existing buildings in the district; however, the Front and Sacramento Street facades would be divided into bays by a series of pilasters to visually break the facades into smaller units of about 15 feet each. In addition, multiple doorways would serve as visual breaks. The ground-floor would feature storefront windows, and the upper ~~stories~~ would employ ~~divided glass~~ modified Chicago-Style windows (divided glass with a larger central panel). A cornice would extend along the top of both facades. As required by the above-cited *Code* sections, and in view of the above, the project would in general be compatible with the composition and massing, scale, materials and colors, and detailing and ornamentation of existing historic buildings in the Front-California Conservation District, ~~and particularly on Front Street.~~ In addition, the project would fill in what is now an empty building site at the corner of Sacramento and Front Streets.

On Sacramento Street, the eastern portion of the project, outside the Conservation District, would appear as a 105-foot tower. A recess would visually separate the tower from the Front Street portion of the building, and this facade would also include a series of bays.

The following two sections, B., Urban Design and Visual Quality, and C., Effects Found Not To Be Significant, are newly added prior to the section on Growth Inducement:

B. URBAN DESIGN AND VISUAL QUALITY (not included in 1995 Draft EIR)

The proposed project would result in a visual change, since it would demolish two existing buildings and replace them, a vacant site and a former parking area with one substantially larger and taller building. The proposed building would be visible from greater distances than are the existing two-story buildings. However, the Front Street facade, at five stories (about 78 feet

including cornice) would be generally comparable in height to the other two buildings on the east (project) site of Front Street (about 64 feet and 80 feet tall, respectively), and thus would not appear out of scale either when viewed from the fronting street or in the overall context of a densely developed urban area.

The proposed project would have longer street frontages than most buildings in the district. The project's principal frontage within the district, on Front Street, would be about 90 feet, longer than any historic building on Front Street and exceeded only by the Home Savings building, which dates from the 1980s. (The project's longer frontage, on Sacramento Street, would not be entirely within the district; this frontage would be visually divided by a recess between the 7-story tower and the remainder of the building.)

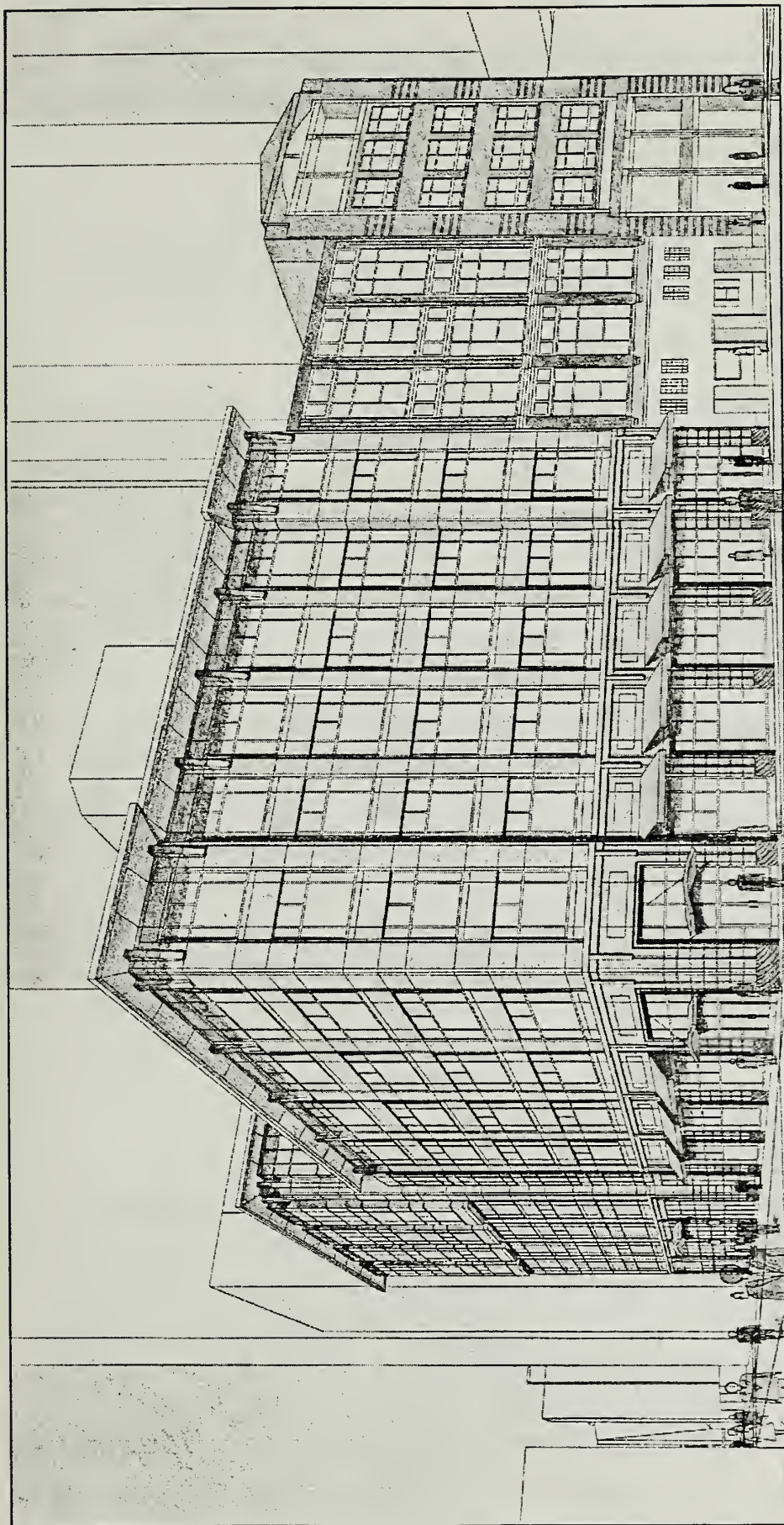
The project's Front Street street wall would be taller than that of most buildings in the historic district, including the buildings across the street on Front Street. As noted above, the street wall would be comparable in height with the two existing buildings that would remain on the east side of Front Street (234-240 Front and 222 Front). The project, including its 105-foot tower, would be substantially shorter than nearby modern development, including the office tower at 100 California Street, east of the project site (about 195 feet) and the Embarcadero Center towers across Sacramento Street (between 385 feet and 580 feet).

The project generally would employ a design intended to achieve visual compatibility with adjacent and nearby historic buildings through the inclusion of facade details such as pilasters and divided-light windows and the use of such materials as brick and stone, in keeping with those found in the Front-California Conservation District.

Figure 6 shows a rendering of the proposed project, prepared by the project architect.

In light of the foregoing, although some observers may object to the design of the proposed project or aspects thereof, the project would not result in a substantial demonstrable negative aesthetic effect on the visual character of the area.

Although the site is visible from Maritime Plaza, a podium-level park in the area, the project would be constructed against a backdrop of larger office buildings. The project would partially block a view of the historic PG&E building at Market and Beale Streets, which is currently visible, framed by other newer buildings, from the western portion of Maritime Plaza, but would



PROPOSED PROJECT

EXISTING BUILDINGS
240 FRONT
222 FRONT

Case No. 93.543E & 96.643E; 246-250 Front Street ■

SOURCE: Heller Manus Architects

Figure 6

Rendering of Proposed Project

not obscure the decorative upper portion of that historic skyscraper. Therefore, visual changes on the site would not substantially change or block any scenic vista currently enjoyed from that park or other public open spaces in the area.

The project would comply with City Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. Light emissions from the project would be comparable to those from adjacent and nearby buildings, and would not substantially alter existing ambient night lighting levels in the area.

C. EFFECTS FOUND NOT TO BE SIGNIFICANT (not included in 1995 Draft EIR)

This section, not included in the 1995 DEIR, describes changes, as a result of the revised project, in effects that were analyzed and found to be less-than-significant in the prior Initial Study (included as Appendix A).

COMPATIBILITY WITH EXISTING ZONING AND PLANS

As with the prior project, the project would comply with the *City Planning Code* requirements concerning height, bulk and use in the C-3-O (Downtown Office) District and the 75-X and 350-S Height and Bulk Districts in which it would be located. Like the prior project, the project would require review and approval under Section 309 of the *City Planning Code*, Permit Review in C-3 Districts, but the revised project would require an exception to the freight loading and service vehicle space requirements of Section 154, in that it would provide two off-street service vehicle spaces (for van-type vehicles) but would not provide any off-street (truck) freight loading spaces. Please see Section II.C, Project Approval Requirements and General Plan Policies, p. 24 for additional information on compatibility with zoning and plans.

CULTURAL (ARCHAEOLOGICAL) RESOURCES

Given the potential for the site to contain subsurface cultural resources from the last half of the 19th century, potentially including parts of former Gold Rush-era storeships, the possibility exists that such artifacts could be encountered as a result of project excavation, which would be required to a depth of approximately 15 feet, compared to the prior project, which would have included only minor excavation. As with the prior project, drilling and driving of piles could damage subsurface cultural resources, but would not likely destroy resources of substantial size, such as pieces of ships or Gold Rush-era piers, should such resources exist. A revised mitigation

measure has been included in the project to reduce potential impacts to subsurface cultural resources should such resources be encountered during construction (see p. 62).

LAND USE

The project would include retail and office uses and, like the prior project, would not alter the general land uses in the immediate area, nor would it disrupt or divide the neighborhood.

POPULATION

The project could generate up to approximately 236 new office jobs and 69 new retail jobs, for a total of 305 new jobs, assuming two floors of retail use, compared to an estimated 69 retail jobs with the prior project.^{18a} (With one floor of retail use, employment generation would total 330.) Assuming these jobs would be new employment in San Francisco, which is a conservative assumption, they would represent one percent or less of the projected increase in citywide employment between 1995 and 2000 and less than one-half of one percent of the projected increase in citywide employment between 1995 and 2015. No employment would be displaced, as the existing buildings on the project site are vacant. This potential increase in employment would be minimal when considered in the context of Downtown San Francisco, the region's employment center, and would not be expected to have a measurable effect on demand for housing in San Francisco or the Bay Area. Assuming that all of the up to 330 new employees would be new residents of San Francisco (a conservative assumption), the new employees would represent approximately 1.6 percent of the projected increase in citywide population between 1995 and 2000, and approximately 0.9 percent of the projected increase in citywide population between 1995 and 2015.^{18b} This increase would not be a substantial impact. The project would be subject to the Office Affordable Housing Production Program, and the sponsor would pay a fee required by *City Planning Code* Sec. 313ff.^{18c}

^{18a} San Francisco Department of City Planning, "Guidelines for Environmental Review: Transportation Impacts," Appendix 1, July 1991.

^{18b} Future population and employment projections from: Association of Bay Area Governments (ABAG), *Projections '96*, December 1995, p. 205, available for review at San Francisco Public Library.

^{18c} As noted in the Project Description, the second floor is assumed to be developed as retail space for a conservative analysis of transportation-related effects and is assumed to be developed as office space, for a conservative analysis of planning requirements.

TRANSPORTATION AND CIRCULATION

A transportation study was prepared for the project and is summarized here.^{18d}

Within the project vicinity, Sansome, Battery, Davis, Drumm, Sacramento, California, Pine, Bush, and Clay Streets are Transit Preferential Streets, as designated in the *San Francisco General Plan*. Washington and Clay Streets, Pine and Bush Streets, and Davis and Drumm Streets south of Washington Street are designated as Major Arterials. Sansome and Battery Streets are designated as Secondary Arterials. The above-designated arterials are also part of the Congestion Management Program (CMP) Network and the Metropolitan Transportation System (MTS) Streets, Highways and Freight Network. California Street is designated as a Citywide Pedestrian Network Street. Freeway access to and from the project site is currently provided via on-ramps at First and Harrison Streets and at Fourth and Harrison Streets, and via off-ramps at Fremont Street and at Fourth and Bryant Streets.

Full buildout of the project would generate up to about 4,520 daily and 205 p.m. peak-hour person-trips, including up to about 770 daily and 35 p.m. peak-hour vehicle trips, compared to about 650 daily and 15 p.m. peak-hour vehicle trips for the prior project.^{18e} These trips would not be noticeable against daily background traffic flows, and would not affect levels of service at the three intersections studied: Sacramento and Front Streets, Sacramento and Battery Streets, and Pine/Davis/Market/Beale Streets. The intersection level of service analysis indicates that the three intersections currently operate at Level of Service B (LOS B), which is an acceptable level of service, and would continue to do so, with no change in level of service, with the addition of project traffic. With traffic from cumulative development in the year 2015, all three intersections would continue to operate at LOS B. Project trips would be unlikely to constitute a substantial portion of overall trips anticipated as a result of existing uses plus potential future (*i.e.*, cumulative) development projected in the vicinity.

^{18d} Environmental Science Associates, "244-256 Front Street Office/Retail Building Transportation Impact Report," May 12, 1997. Available for public review at the San Francisco Planning Department, 1660 Mission Street.

^{18e} The proposed project would consist of two phases, *i.e.*, Phase 1 (a one-story plus mezzanine retail building) and Phase 2 (buildout of a full seven-story office/retail building); see the Project Description section of this document. Transportation/Circulation effects discussed herein reflect conditions under full buildout of the project.

The project site is well-served by transit, including MUNI lines 1-California, 12-Folsom, 41-Union, and 42-Downtown Loop, all of which operate within two blocks of the site, as does the California Street cable car. Additional peak-period express service is provided nearby, including shuttle service to the CalTrain Peninsula commute service. Golden Gate Transit bus service to and from the North Bay operates on Battery and Sansome Streets (within two blocks); BART and MUNI Metro rail lines are accessible at the Embarcadero Station, three blocks away; and AC Transit (East Bay) and SamTrans (Peninsula) buses are accessible at the Transbay Terminal, about four blocks away. In the p.m. peak hour, the project would generate about 55 additional transit riders, chiefly MUNI riders. These additional riders would be dispersed among several transit lines and would not measurably affect existing service.

The project would generate a demand for up to about 110 off-street parking spaces, including about 35 long-term and 75 short-term spaces. Off-street parking is not required for non-residential uses in the C-3 zoning districts (*City Planning Code*, Sec. 161). The project would provide 15 independently accessible off-street parking stalls, with enough space (*i.e.*, about 8,000 gsf) in the basement to accommodate about 35 vehicles under tandem valet operations, resulting in an unmet demand of up to about 95 parking spaces, assuming no tandem operations. Unmet parking demand would be expected to be accommodated in nearby parking garages, where capacity is available.

The project would generate a demand for up to about 15 service vehicle stops per day. Average and peak hourly loading space needs would be about one space per hour. The project would be required to provide one off-street (standard truck) freight loading space to serve the office and retail land uses under the assumed development (*i.e.*, second floor retail) scenario, and two off-street freight loading spaces under the alternate development (*i.e.*, second floor office) scenario (*City Planning Code*, Section 152.1, Table 152.1). The proposed project would provide two off-street van loading spaces, rather than the required standard truck space(s), and an exception to Section 154(b) of the *City Planning Code* would be sought by the applicant, as permitted in accordance with Section 309(a) of the *City Planning Code*.

The project would meet the average and peak hourly demand (about one loading spaces per hour, with either one or two stories of retail), if deliveries/service calls were made by van-type vehicles. To the extent full-size trucks were used, delivery/service vehicles would seek on-street loading spaces along Front and Sacramento Street, and double parking by those vehicles could occur, although deliveries generally occur in the morning hours, and therefore, peak traffic flow (in the p.m. peak hour) would not be expected to be affected. As described in Chapter II, Project

Description, the project would eliminate eight on-street yellow zone spaces on Front Street, four on either side, with the construction of widened sidewalk "bulbs" to provide required open space. That action would cause full occupancy of the remaining on-street loading spaces to occur during a greater period of time than at present, and could increase incidents of double parking, but not to a degree that would be expected to affect p.m. peak-hour traffic.

Construction activities would involve truck trips to and from the site and could inconvenience drivers in the area. Any construction-related changes to area parking and transit, however, would be temporary and intermittent.

NOISE

Noise impacts would be similar to those analyzed in the Initial Study, except that construction would last approximately 18 months, compared to 9 months with the prior project, and pile driving would occur intermittently over about three weeks, compared to two weeks.

Project operation would not be expected to generate substantial noise. An approximate doubling of traffic volumes in the area would be necessary to produce an increase in ambient noise levels noticeable to most people. Based on the Transportation Study prepared for the project, the project would not generate such traffic volumes, and the project therefore would not result in perceptibly greater noise levels than those existing in the area. Operation of the building, using standard heating, ventilation and air conditioning systems, itself also would not be anticipated to perceptibly increase noise.

AIR QUALITY AND CLIMATE

Air Quality - The Bay Area Air Quality Management District (BAAQMD) has established thresholds for projects requiring its review for potential air quality impacts. Generally, for commercial projects, the threshold is between 4,100 and 4,500 daily vehicle trips. Based on the Transportation Study prepared for the project, the project would generate fewer than 800 daily vehicle trips. Therefore, as with the prior project, no significant operational air quality impacts would be generated by this project.

Construction-related air quality impact would be similar to those of the prior project. Demolition, grading and other ground-disturbing construction activities would temporarily affect local air quality for about three months, compared to two months with the prior project. As with

the prior project, the project sponsor would require the contractor to wet down the construction site twice a day during construction to reduce particulates by at least 50 percent; would require covering soil, sand and other material; and would require street sweeping around demolition and construction sites at least once per day (see mitigation, p. 64).

Shadow - To determine whether this project would conform to *City Planning Code* Section 295, a shadow fan analysis was performed by the Planning Department. This analysis determined that the project shadow could potentially extend as far as one public open space subject to Section 295, Maritime Plaza, on Clay Street between Battery and Davis Streets. A supplemental shadow study concluded that, although project shadow would reach Maritime Plaza in early morning in winter, existing shadow cast by the 100 California Street building would already shade the plaza at that time. The project would not add any new shadow to Maritime Plaza or any other Section 295 properties at that time or any other time between one hour after sunrise and one hour before sunset, which are the hours governed by Section 295.^{18f} Based on shadow analysis for a 9-story building previously proposed on the project site, the project would add some new shadow to the publicly accessible podium-level private open space at Embarcadero Center Two during the late fall and early winter months.^{18g}

Wind^{18h} - Wind conditions partly determine pedestrian comfort on sidewalks and in other public areas. Large buildings can redirect wind flows around and down to street level. In order to provide a comfortable wind environment for people in San Francisco, the *City Planning Code* requires that new buildings in the C-3 Use Districts (generally, Downtown) be designed so as not to cause ground-level winds to exceed, more than 10 percent of the time, 11 miles per hour (mph) in pedestrian areas and 7 mph in seating areas (Section 148). Where existing winds speeds are greater than the pedestrian criteria, new buildings are to be designed to reduce wind

^{18f} Charles Bennett, Environmental Science Associates, Technical Memorandum, "Potential Proposition K Shadow Effects - Proposed Building at 246-250 Front Street, San Francisco," May 23, 1997. This study is on file at the San Francisco Planning Department, 1660 Mission Street, as is the preliminary shadow fan analysis.

^{18g} Shadow study for Case No. 90.746E, 250 Front Street, prepared by Environmental Science Associates, January 30, 1991. This study is on file at the San Francisco Planning Department, 1660 Mission Street.

^{18h} This analysis is based on a Technical Memorandum, dated March 12, 1997, by Charles Bennett, Environmental Science Associates. This memorandum is available for public review at the San Francisco Planning Department, 1660 Mission Street.

speeds to meet the criteria, where this is feasible. The *Code* requires that buildings not cause equivalent wind speeds to reach the hazard level of 26 mph for a single full hour of the year.¹⁸ⁱ

Previous development proposals for the project site have included wind-tunnel testing for proposed buildings with setback towers of between 150 feet and 300 feet in height and a 75-foot street wall height on Front Street. This 75-foot street wall is comparable to that of the current project and, because the street wall is an important determinant of ground-level winds, the buildings tested in the prior wind-tunnel tests were determined, following review of the test data, to adequately represent the shape and bulk of the current project for purposes of analysis of pedestrian-level wind effects. These earlier tests determined that existing pedestrian-level wind speeds on the Front and Sacramento Street sidewalks range between 7 mph and 13 mph, with higher wind speeds to 16 mph at Sacramento and Davis Streets.

Based on the prior wind-tunnel tests, development of the project would not cause new exceedances of the 11-mph pedestrian comfort criterion, and would not cause an exceedance of the hazardous wind criterion. The project would tend to reduce wind speeds on the sidewalks adjacent to the site, by approximately 1 mph, but would not be expected to eliminate existing exceedances of the comfort criterion. Overall, there is little potential for the proposed project to have any adverse effect on the wind environment, and there is no reason to conclude that modification of the design of the proposed project would further improve existing wind conditions in the site vicinity.

GEOLOGY/TOPOGRAPHY

Because a full basement would be constructed as part of the project, excavation would be to a depth of approximately 15 feet over the entire site, with limited additional excavation up to about three feet in depth for grade beams, pile caps and footings. (The prior project would have required only limited excavation.) A total of about 5,400 cu. yd. would be excavated. About 200 piles would be driven, using pre-drilled holes if feasible. (The existing two buildings on the project site, to be demolished, contain basements.) Dewatering could be required during construction.

¹⁸ⁱ Equivalent wind speeds are speeds that account for the effects of gustiness and turbulence.

WATER

The project site is within the Eastside Reclaimed Water Use Area designated by Section 1209 of the Reclaimed Water Use Ordinance (approved November 7, 1991), which added Article 22 to Part II, Chapter X of the *San Francisco Municipal Code (Public Works Code)*. Effective 180 days from the date of this ordinance, non-residential projects over 40,000 sq. ft. that require a site permit, building permit, or other authorization, and are located within this area, shall provide for the construction and operation of a reclaimed water system for the transmission of reclaimed water within buildings and structures. That is, the building would need to be designed with separate plumbing to service uses that could employ reclaimed water (*e.g.*, toilets). The ordinance also requires that owners, operators, or managers of all development projects register their project with the Water Department. The Water Department will then issue a certificate of intention to use reclaimed water, and reclaimed water shall be used unless the Water Department issues a certificate exempting compliance because reclaimed water is not available, an alternative water supply is to be used, or the sponsor has shown that the use of reclaimed water is not appropriate. The appropriate use of reclaimed water, when it becomes available, would reduce potable water consumption in the area.

As noted under Geology, above, dewatering could be required, as was the case for the prior project. The likelihood of dewatering would be greater with the currently proposed project due to the increased depth of excavation proposed.

HAZARDS

An asbestos survey was performed in 1990 for the existing buildings on the project site, both of which would be demolished.^{18j} As is common in older buildings, asbestos-containing materials were found in ceiling and roofing materials and adhesive and in ductwork insulation. It is likely that asbestos-containing materials are still be present. As stated in the Initial Study, demolition of the existing buildings must comply with State law that requires, where there is asbestos-related work involving 100 square feet or more of asbestos-containing materials, that a contractor be certified and that certain procedures be followed.

^{18j} Dames & Moore, Draft Report, *Asbestos Survey*, 244-246, 248-250, 256 Front Street, San Francisco, California, October 22, 1990. The report is on file at the San Francisco Planning Department, 1660 Mission Street.

The project would require excavation of about 5,400 cu. yds. of soil, compared to the limited excavation proposed with the prior project. Therefore, in compliance with the Maher Ordinance, a revised Site Mitigation Plan was prepared for the project and submitted to the Department of Public Health.^{18k,18l} The revised Site Mitigation Plan proposes remove and properly dispose of the remnants of a hydraulic lift from a former service station and the contaminated soil disturbed during excavation and grading, and to encapsulate remaining on-site soils beneath the building foundation and floor slab. The revised Site Mitigation Plan was reviewed by the Department of Public Health on January 22, 1997, and found to satisfy Article 20 requirements. The Department would also require preparation of a site management plan and placement of a deed restriction on the property to insure the future integrity of the cap on contaminated soils to be left in place (*i.e.*, the slab foundation), and to provide safe procedures for both routine and emergency breaching of the cap that may be required in the future.^{18m} The project sponsor has agreed to implement the Site Mitigation Plan and to develop the site management plan and impose the deed restriction (see mitigation, p. 65).

Occupants of the proposed building would contribute to congestion if an emergency evacuation of the downtown area were required. Section 12.202(e)(1) of the *San Francisco Fire Code* requires that all owners of high-rise buildings (over 75 feet) "shall establish or cause to be established procedures to be followed in case of fire or other emergencies. All such procedures shall be reviewed and approved by the chief of division." Additionally, project construction would have to conform to the provisions of the Building and Fire Codes, which require additional life-safety protections for high-rise buildings.

There would be no substantive changes to the impacts previously identified for "Utilities/Public Services," "Biology," or "Energy/Natural Resources."

^{18k} The "Maher Ordinance" (Article 20 of the *San Francisco Public Works Code*) requires that applicants for building permits within a certain area (largely the part of San Francisco created by landfill) prepare a site history and analyze the site's soil for hazardous wastes.

^{18l} Dames & Moore, *Revised Site Mitigation Plan, 244-256 Front Street, San Francisco, California*, December 20, 1996. The report is on file at the San Francisco Planning Department, 1660 Mission Street.

^{18m} Ben Gale, Director, City and County of San Francisco Department of Public Health, Bureau of Environmental Health Management, Hazardous Waste Program, letter to Director of Building Permits and to David C. Harrison, Olympic / Main Associates, October 13, 1995, and January 22, 1997. The approval letters are on file at the San Francisco Planning Department, 1660 Mission Street.

D. GROWTH INDUCEMENT (p. 32 of 1995 DEIR - Section is changed from IV.B to IV.D)

In general, a project would be considered growth-inducing if its implementation would encourage population increases and/or new development that might not occur if the project were not approved and implemented. The proposed project would consist of infill development on a parking lot and a vacant building site, as well as redevelopment on the site of two existing vacant buildings. As noted in Chapter II, Project Description, the net increase in floor area would be approximately ~~10,500~~ 79,200 gross sq. ft. beyond that already existing on the site. The potential increases in population and employment resulting from the project would be limited to jobs created on the project site (~~69~~ 305 are estimated, as stated on p. 53). Located in an urban area, the project would not necessitate or induce the extension of municipal infrastructure. In view of the above, there is no reason to believe that the project would result in additional development in Downtown San Francisco that would not otherwise occur.

V. MITIGATION MEASURES PROPOSED TO MINIMIZE SIGNIFICANT IMPACTS OF THE PROJECT (1995 Draft EIR p. 33)

In the course of project planning and design, measures have been identified that would reduce or eliminate potential environmental impacts of the proposed project. Some of these measures have been, or would be, voluntarily adopted by the project sponsor or project architect and contractor and thus are proposed; some are under consideration and some have been considered and rejected by the project sponsor. Implementation of some may be the responsibility of other agencies. Measures under consideration or rejected may be required by the City Planning Commission as conditions of project approval, if the project were to be approved. Each mitigation measure and its status is discussed below.

There are several items required by law that would serve to mitigate impacts; they are summarized here for informational purposes. These measures include: no use of mirrored glass on the building to reduce glare, as per City Planning Commission Resolution 9212; limitation of construction-related noise levels, pursuant to the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code, 1972); and observance of State and federal OSHA safety requirements related to handling and disposal of hazardous materials.

Measures which are not required by legislation but which would also serve to mitigate environmental impacts appear below. Mitigation measures preceded by an asterisk (*) are from the Initial Study (see Appendix A, p. A.31), although some have been modified.

As described in the attached Initial Study (Appendix A), the proposed project has the potential to affect archaeological resources, would involve pile driving, and could involve exposure to hazardous materials. As a result, the project sponsor has agreed to implement the following mitigation measures:

CULTURAL RESOURCES

MEASURE PROPOSED AS PART OF THE PROJECT

- *• Given the location and ~~depth magnitude~~ of excavation proposed, and the likelihood ~~possibility~~ that archeological resources would be encountered on the project site, the sponsor has agreed to retain the services of an archaeologist. The archaeologist would

carry out a pre-excavation testing program to better determine the probability of finding cultural and historical remains. The testing program would use a series of mechanical exploratory borings or trenches and/or other testing methods determined by the archaeologist to be appropriate, first determine, in conjunction with the Environmental Review Officer (ERO), whether he/she should instruct all excavation and foundation crews on the project site of the potential for discovery of archaeological resources, and the procedures to be followed if such resources are uncovered.

If, after testing, the archaeologist determines that no further investigations or precautions are necessary to safeguard potentially significant archaeological resources, the archaeologist would submit a written report to the Environmental Review Officer (ERO), with a copy to the project sponsor. If the archaeologist determines that further investigations or precautions are necessary, he/she shall consult with the ERO and they shall jointly determine what additional procedures are necessary to minimize potential effects on archaeological resources.

~~The archeologist would then design and carry out~~ These additional mitigation measures would be implemented by the project sponsor and might include a program of on-site monitoring of all ground-disturbing activities, during which he/she would record observations in a permanent log. The monitoring program, whether or not there are finds of significance, would result in a written report to be submitted first and directly to the ERO, with a copy to the project sponsor. During the monitoring program, the project sponsor would designate one individual on site as his/her representative. This representative would have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources should they be encountered.

Should evidence of cultural resources of potential significance be found during the monitoring program, the archaeologist would immediately notify the Environmental Review Officer (ERO), and the project sponsor would halt any activities which the archaeologist and the ERO jointly determine could damage such cultural resources. Ground-disturbing activities that might damage cultural resources would be suspended for a total maximum of four weeks cumulatively over the course of construction.

After notifying the ERO, the archaeologist would prepare a written report to be submitted first and directly to the ERO, with a copy to the project sponsor, which would contain an assessment of the potential significance of the find and recommendations for what measures should be implemented to minimize potential effects on archaeological resources. Based on this report, the ERO would recommend specific additional mitigation measures to be implemented by the project sponsor. ~~Mitigation~~ These additional measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation, and recovery of cultural material.

Finally, the archaeologist would prepare a draft final report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure would be sent first and directly to the ERO for review. Following approval by the ERO, copies of the

final report would be sent by the archaeologist directly to the President of the Landmarks Preservation Advisory Board and the Northwest Information Center of the California Historical Resources Information System. The Office of Environmental Review shall receive three copies of the final archaeological report, accompanied by transmittals documenting its distribution to the Landmarks Preservation Advisory Board and the Northwest Information Center.

NOISE AND VIBRATION

MEASURE PROPOSED AS PART OF THE PROJECT

- *• The project sponsor would require the construction contractor to pre-drill piles where soil conditions permit.

CONSTRUCTION AIR QUALITY

MEASURE PROPOSED AS PART OF THE PROJECT

- *• The project sponsor would require the contractor(s) to sprinkle demolition sites with water during demolition, excavation and construction activity; sprinkle unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soil, sand or other such material; and sweep surrounding streets during demolition and construction at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose.

GEOLOGY

MEASURES PROPOSED AS PART OF THE PROJECT

- *• One or more geotechnical investigations by a California-licensed geotechnical engineer are included as part of the project. The project sponsor and contractor would follow the recommendations of the final geotechnical report(s) regarding any excavation and construction for the project. The project sponsor would ensure that the construction contractor conducts a pre-construction survey of existing conditions and monitors the adjacent building for damage during construction, if recommended by the geotechnical engineer.
- Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. Based upon this discussion, the soils report would contain a determination as to whether or not a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding

buildings and adjacent streets. If a monitoring survey is recommended, the Department of Building Inspection would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this monitoring. Instruments would be used to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during construction, groundwater recharge would be used to halt this settlement. The project sponsor would delay construction if necessary. Costs for the survey and any necessary repairs to service lines under the street would be borne by the project sponsor.

- Should dewatering be necessary, the project sponsor and contractor would follow the geotechnical engineers' recommendations regarding dewatering to avoid settlement of adjacent streets, utilities and buildings that could potentially occur as a result of dewatering.
- If dewatering were necessary, groundwater pumped from the site would be retained in a holding tank to allow suspended particles to settle, if this were found necessary by the Bureau of Environmental Regulation and Management of the Department of Public Works, to reduce the amount of sediment entering the storm drain / sewer lines.
- The project sponsor would require the general contractor to install and maintain sediment traps in local stormwater intakes during the construction period to reduce the amount of sediment entering the storm drain / sewer lines, if this is found necessary by the Bureau of Environmental Regulation and Management of the Department of Public Works.
- The project sponsor and contractor would follow the geotechnical engineers' recommendations regarding installation of settlement markers around the perimeter of shoring to monitor any ground movements outside of the shoring itself. Shoring systems would be modified as necessary in the event that substantial movements were detected.

WATER QUALITY (not included in 1995 Draft EIR)

- If dewatering were necessary, the project sponsor would follow the recommendations of the geotechnical engineer and/or environmental remediation consultant, in consultation with the Bureau of Environmental Regulation and Management of the Department of Public Works, regarding treatment, if any, of pumped groundwater prior to discharge to the combined sewer/storm drain system.
- See the fourth and fifth measures under Geology, above, for mitigation proposed to prevent sediment from entering storm sewers.

HAZARDS

MEASURES PROPOSED AS PART OF THE PROJECT

- *• ~~In the event that~~ As project construction would involve excavation of more than 50 cubic yards of soil, requirements established by Article 20 of the *San Francisco Public Works*

Code (i.e., the "Maher Ordinance") would reduce potential effects related to soil contamination to a less-than-significant level. ~~In the event that project construction would involve excavation of less than 50 cubic yards, and/or would encapsulate soil containing hydrocarbons and soluble lead concentrations above established thresholds, the requirements of Article 20 would not strictly apply, although t~~The project sponsor has prepared a Site Mitigation Plan (refer to page 60) and has agreed to ensure that the Site Mitigation Plan is implemented with oversight from the City's Department of Public Health.

The Plan would require that the construction contractor ~~limit the amount of excavation,~~ handle and dispose of excavated soils properly, employ worker health and safety and dust control procedures, and encapsulate remaining soils on-site, and also would require a State Registered Professional Geologist or Engineer to certify, at the completion of foundation activities, that all elements of the Site Mitigation Plan had been performed in compliance with Article 20 requirements. Conditions imposed by the Department of Public Health would require dust control measures to ensure "no visible dust" emissions, covering of soil stockpiles, rain water runoff control, and designation of a person with the authority to stop work at any time if a release of contaminated soil occurs or is threatened. The Department of Public Health would also require preparation of a site management plan and placement of a deed restriction on the property to insure the future integrity of the cap on contaminated soils to be left in place (i.e., the slab foundation), and to provide safe procedures for both routine and emergency breaching of the cap that may be required in the future.

- *• The project sponsor would ensure that building surveys for asbestos (if required), PCB-containing equipment (including elevator equipment), hydraulic oils, fluorescent lights, and lead-based paint are performed prior to the start of demolition. (Removal and proper disposal of the hydraulic lift and associated fluids was included in the Site Mitigation Plan.) Any hazardous materials so discovered would be abated according to federal, state, and local laws and regulations.

HISTORIC ARCHITECTURAL RESOURCES

The project sponsor has further agreed to implement the following measures, which would reduce but not eliminate potentially significant adverse effects on the Front-California Conservation District.

- Prior to demolition of the buildings on the project site, the project sponsor would employ an architectural historian to document the Front-California Conservation District, the subject buildings, and their history in greater detail than has been done to date. The project sponsor would submit that documentation, along with modified-format Historic American Buildings Survey drawings of the buildings, to the History Room of the San Francisco Main Library and the Secretary of the Landmarks Preservation Advisory Board, and possibly to the California Historical Society.

- To promote understanding of the Front-California Conservation District, the project sponsor would install on or near the replacement structure a plaque and/or other monument memorializing the District and the two buildings to be demolished. A plaque would be mounted on the front of the new building to provide pedestrians with both a photographic image of the demolished buildings and information about the history of the buildings and the District. Design and placement of any plaque or monument would be reviewed and approved by staff of the Landmarks Preservation Advisory Board. The project sponsor would also relocate to the new building the existing plaque marking the former site of Fort Gunnybags.

VI. SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED (1995 Draft EIR p. 37)

In accordance with Section 21067 of the California Environmental Quality Act (CEQA), and with Sections 15040, 15081 and 15082 of the State CEQA Guidelines, the purpose of this chapter is to identify impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the project, or by other mitigation measures that could be implemented, as described in Chapter V, Mitigation Measures, pp. 62-9.

This chapter is subject to final determination by the City Planning Commission as part of its certification process for the EIR. The Final EIR will be revised, if necessary, to reflect the findings of the Commission.

The loss of integrity or significance of a recognized significant historic architectural resources, such as an individual landmark, historic district, or Significant (Category I or II) Building, would typically be considered a significant environmental effect. Contributory Buildings (Category III and IV Buildings) as defined by Article 11 of the *City Planning Code* may be valued, but Article 11 clearly permits their demolition, and the Downtown Plan states that "their importance is not so great as to justify a requirement that they be retained."¹⁹ For these reasons, the proposed demolition of two Category IV Buildings in and of itself would not be considered a significant environmental effect.

In contrast to Contributory Buildings, conservation districts, as defined by Article 11 of the *City Planning Code*, would be considered by most preservation and planning professionals, and by many members of the public, to be significant historic architectural resources, similar to historic districts. By definition, conservation districts are "geographic areas of unique quality" in which "buildings of somewhat lesser quality than those required to be retained take on an increased importance."²⁰ Conservation districts have "special architectural and aesthetic importance" and

¹⁹ San Francisco Master Plan, Downtown Area Plan, p. II.1.24.

²⁰ San Francisco Master Plan, Downtown Area Plan, p. II.1.25.

a "substantial concentration of Significant and Contributory Buildings" (*City Planning Code* Sec. 1103).²¹

Once the Front-California Conservation District is acknowledged as a significant resource, the question becomes whether or not the project, alone or in combination with past changes within the district, would constitute a substantial adverse change. The precise point at which cumulative alterations to a significant historic architectural resource become a substantial adverse change, and therefore a significant environmental effect, is not always clear-cut because of the subjective and qualitative nature of historic and architectural significance. Thus, it is debatable whether (a) the integrity of the Front-California Conservation District has already been substantially impaired by past changes; (b) the current project would push the district "over the edge" and constitute a substantial adverse change; or (c) the current project when combined with past demolitions would leave the district sufficiently intact to retain its significance.

Department staff has considered the above issues carefully, along with the analysis of the Front-California Conservation District contained in the historic architectural assessment prepared by Page & Turnbull,²² and recommends that the proposed project, when combined with past changes within the Front-California Conservation District, be considered a significant adverse effect on the district. This recommendation is based on changes in the number of rated buildings within the district (12 originally, nine today, seven following implementation of the proposed project), and a concern that the changes in the number and concentration of rated buildings within the district would reduce the overall integrity or significance of the district, and could ~~require that justify amendment of the City Planning Code be amended~~ to eliminate the Front-California Conservation District, or to re-draw its boundaries. However, it should be noted that approval of the project would not trigger a process for elimination of the conservation district or re-drawing of the district boundaries. A change in the district boundaries would require approval by the Board of Supervisors (City Planning Code Sec. 1107). Further, as noted previously, there is no specified City Planning Code criterion for the minimum number or percentage of rated buildings in a conservation district.

²¹ As previously noted, Significant and Contributory Buildings, by definition (Sec. 1102(a) - (d)), must be at least 40 years old.

²² Page & Turnbull, Inc., Historic Resources Assessment, 246, 250 Front Street, December 19, 1995. A copy of this assessment is available for public review in the project case file at the San Francisco Planning Department, 1660 Mission Street, San Francisco.

VI. Significant Unavoidable Effects

As stated in the second paragraph, above, staff's recommendation is subject to final determination by the City Planning Commission as part of its certification process for the EIR.

VII. ALTERNATIVES TO THE PROPOSED PROJECT (1995 Draft EIR p. 39)

This chapter identifies alternatives to the proposed project, discusses environmental impacts associated with each alternative, and, where an alternative has been considered by the project sponsor in development of the project, gives the reasons the alternative was rejected in favor of the project. Project decision-makers could adopt any of the following alternatives, if feasible, instead of approving the proposed project.

A. ALTERNATIVE A: NO PROJECT

This alternative would entail no change to the site, which would remain in its existing condition, with the two structures, parking lot and vacant site. No demolition would occur. This alternative would not preclude, but would not necessarily entail, reoccupancy of the existing buildings. If the No Project Alternative were implemented, no impacts of the project would occur. However, the buildings on the project site ultimately would have to be brought into compliance with the City's Unreinforced Masonry Building Ordinance through seismic upgrade or demolition.

B. ALTERNATIVE B: SEISMIC UPGRADE AND ADAPTIVE REUSE

Under this alternative, the two existing buildings on the project site would be rehabilitated and seismically upgraded in accordance with the requirements of applicable building code standards. The buildings would be used for retail stores on the ground floor, and for retail or office use on the second story, ~~as with the proposed project~~. The existing parking lot would be used for parking, and the vacant site at the corner of Sacramento and Front Streets would remain vacant.

This alternative would avoid demolition of the existing buildings and would not change the Front-California Conservation District, except by renovating the existing buildings on the project site.

Of the effects described in the Initial Study (pp. A.8 - A.30) and in Section IV.C, Effects Found Not to be Significant, p. 52), those related to the intensity of development (population, transportation, operational noise and air quality emissions, and demand for public utilities/services and energy) would be substantially less than with the currently proposed project, since the retail square footage to be developed, even with both stories in retail use.

would be about 60 percent of that proposed with the project, and this Alternative might not include office use. (If the second floor were used for office space, the amount of office space would be less than 15 percent of that in the currently proposed project.) Effects on subsurface cultural resources ~~could~~ would also be less than with the project, ~~depending on the methodology employed in the seismic upgrade~~, as less excavation ~~might not~~ would be required. Effects on land use would be similar to those of the project, ~~as both the project and this alternative would consist of retail uses~~. Effects related to construction-related noise and air quality would also be less; in particular, no pile driving would be anticipated. Similarly, construction-related effects on hydrology would be less than with the proposed project. Effects related to potential exposure to hazardous materials in the soil, if any, could be less than those of the proposed project due to the expectation of less excavation; a Site Mitigation Plan would be carried out if necessary, as it would with the project. Effects related to hazardous building materials would be comparable to those of the proposed project. This alternative would have little or no visual impact.

This alternative would result in less total floor area, in form of two smaller floorplates, than would the project, and therefore this alternative would not meet the project sponsor's objective of providing the maximum uninterrupted retail floor area on the project site. Further, it would result in only limited office space, if any, and would not meet the sponsor's objective of developing Class A office space with usable and efficient floor plates.

The following two alternatives replace text describing Alternative C on pp. 40-41:

C. ALTERNATIVE C: SEISMIC UPGRADE, ADAPTIVE REUSE AND NEW CONSTRUCTION

Under this alternative, the two existing buildings on the project site would be rehabilitated and seismically upgraded in accordance with the requirements of applicable building code standards. A new L-shaped structure would be built on the vacant site and on the parking lot, wrapping around the existing buildings. The new building and the two existing buildings would be physically connected through openings in the side and rear walls of the existing buildings. This alternative would retain the existing buildings as separate structures and is presumed to qualify for the 10 percent federal tax credit for rehabilitation of historic properties in accordance with the Secretary of the Interior's Standards for Rehabilitation. (See Appendix B, p. A.35 for a description of the potential approach to seismic strengthening of the existing buildings.) Under this alternative, the three buildings would function as a single structure at the ground floor and second story. The ground floor would be occupied by retail use(s) and could accommodate a

single retail tenant, as with the proposed project, albeit with interruptions in the floor plate resulting from retention of the existing building walls. Openings would be cut in the existing buildings' side and rear walls to connect the ground-floor space, and potentially the second story as well; this level could accommodate retail or office use. (As described in Chapter III, the existing buildings are currently linked by a doorway at the second story.)

The three buildings could support retail or office use at the second story. The new building would be occupied by office uses from the third story upward. It is anticipated that the new structure would be a maximum of five stories (approximately 75 feet) in height because retention of the existing buildings would make impractical the construction of additional stories above the 75-foot height limit on the western portion of the site, as greater height would only be permitted on the eastern portion of the site, generally on the 40-foot-wide former parking lot behind the existing buildings. This alternative would include no basement parking or loading facilities, as construction of a basement beneath the existing buildings would not be feasible, and the configuration of the lot area not covered by the existing buildings would preclude such construction. The mezzanine retail storage area proposed with the project would not be included under this alternative.

It is assumed for purposes of analysis that this alternative would result in development of similar retail square footage as the proposed project (about 24,000 gsf), because the loss of space due to retention of the existing building walls and the construction of new exterior walls for the new building would generally be offset by the elimination of the project's vehicle ramp to the basement. Office square footage would be about 25,000 gsf under this alternative, or about half that with the project, due to the reduced building height and the smaller footprint of new construction, compared to the project. Total square footage would be approximately 49,000 gsf.

This alternative would avoid demolition of the existing buildings. Assuming the new construction were of sympathetic design, as required by *City Planning Code* Section 1113, this alternative would have no substantial adverse effect on the Front-California Conservation District. Additional openings would be cut in the walls of the existing buildings, but the buildings would remain separate structures by virtue of the seismic strengthening scheme that would be used (see Appendix B).

Like the project, this alternative would fill in the vacant site at the corner of Sacramento and Front Streets with a structure of compatible scale and design. New construction under this alternative would be shorter than the project, but the Front Street street wall would be the same -

about 75 feet. However, because this alternative would retain the existing buildings on the project site, it would not result in a relatively uniform street wall along most of the east side of Front Street, as would the project.

To the extent that preservation of the existing buildings would be considered visually desirable, this alternative could have less visual impact than the proposed project. As noted above, this alternative would retain greater variation in street wall height on Front Street than would the proposed project.

Of the effects described in the Initial Study (pp. A.8 - A.30) and in Section IV.C, Effects Found Not to be Significant, p. 52, those related to the intensity of development (population, traffic, transit and pedestrian activity, operational noise and air quality emissions, and demand for public utilities/services and energy) would be somewhat less than those of the proposed project, since the total square footage of this alternative would be less. As noted above, this alternative would provide no parking. Because it would generate a parking demand of 95 spaces, compared to 110 spaces with the project, the resulting parking shortfall of 95 spaces would be the same as the project's net shortfall (110 minus 15 spaces provided). Average loading demand would be about 0.5 spaces per hour, and peak demand would be about 0.6 spaces per hour, compared to 0.7 and 0.9 spaces, respectively for the project. This alternative would provide no loading spaces, resulting in a greater on-site shortfall than that described for the project. However, because this alternative would result in a smaller building, the open space requirement could be approximately one-third less than with the project, and the resulting bulbing of Front Street to meet the open space requirement would be smaller, thereby displacing perhaps two fewer on-street loading spaces. Accordingly, this alternative would not be expected to result in any greater shortfall in on-street loading spaces than would occur with the project.

Effects on subsurface cultural resources and construction-related air quality, geology and hydrology effects would be less intensive than those of the project, since there would not be excavation for a basement. Construction-related noise would be comparable to that of the project, as pile-driving would be employed in the foundation of the new structure. Effects on land use would be similar to those of the project, as both the project and this alternative would consist of office and retail uses. Effects related to potential exposure to hazardous materials in the soil, if any, and to hazardous building materials would be less than those of the proposed project due to the minimal excavation; a Site Mitigation Plan, albeit modified, would be carried out, as with the project.

This alternative would provide only about half of the proposed office space, and the L-shaped configuration of the approximately 8,000-square-foot floor plates would be less efficient than the project's more conventional rectangular layout, as it could result in smaller offices lining two corridors on either leg of the "L." Thus, this alternative would not fully meet the sponsor's objective for development of usable and efficient office space floor plates. Further, while this alternative could provide for a single retail tenant, it would not provide the uninterrupted retail floorplate desired by the sponsor. While this alternative would result in approximately the same retail floor area as the project, the sponsor believes that substantially maintaining the existing buildings' exterior walls would make the retail space less flexible and therefore less usable. Therefore, this alternative would not meet the project sponsor's objective of providing the maximum uninterrupted retail floor area on the project site.

**D. ALTERNATIVE D: SEISMIC UPGRADE, ADAPTIVE REUSE AND
NEW CONSTRUCTION ENCOMPASSING THE EXISTING BUILDINGS**

This alternative would entail construction of a project of essentially the same height, mass and bulk as the proposed project, but would incorporate the existing buildings into the development. The existing buildings would be rehabilitated and seismically upgraded in accordance with the requirements of applicable building code standards, and the new building would be constructed adjacent to and above the existing buildings, in a manner somewhat similar to that which incorporated the Hoffman Grill at 619 Market Street (City Landmark No. 144). In contrast to Alternative C, the existing buildings would be physically surrounded by the new structure (on the north side, rear, and above, as well as potentially on the south side), except on the Front Street facades. The design of the new building would be made compatible to the existing structures to the maximum extent feasible. Office and retail square footage would be similar to that with the project, about 49,000 gsf and about 24,000 gsf, respectively; total square footage would be about 73,000 gsf. No on-site parking or loading, no basement, and no mezzanine retail storage would be constructed with this alternative.

This alternative would largely avoid demolition of the existing buildings. Assuming the new construction were of sympathetic design, as required by *City Planning Code* Section 1113, this alternative might have no substantial adverse effect on the Front-California Conservation District. This alternative would retain most of the existing buildings as separate structures, and could qualify for the 10 percent federal tax credit for rehabilitation of historic properties in accordance with the Secretary of the Interior's Standards for Rehabilitation. (See Appendix B, p. A.35 for a description of the potential approach to seismic strengthening of the existing

buildings.) However, construction of the new structure above the existing buildings could require that piles be driven through the basement of the existing building(s) and possibly that the new structure's south structural members displace portions of the south wall of the existing building at 246 Front Street.

Visually, while this alternative would retain the existing buildings, it would develop a building of the same mass as the proposed project. Without detailed design plans, it is unknown whether visual integration of the existing buildings into the new structure could be accomplished.

Transportation effects of this alternative would be similar to those of the proposed project, except that with no on-site parking or loading, the net parking shortfall and net shortfall in on-street loading spaces would be greater than with the project (and Alternative C). Parking demand could be accommodated in nearby garages and lots, but the shortfall in loading space could result in more double-parking on Front Street at times of peak demand for loading space, although these times generally do not coincide with periods of peak traffic flow.

Effects related to operational air quality and noise and demand for public services and energy would be similar to those of the proposed project, since the overall square footage of development would be similar. As with Alternative C, effects on subsurface cultural resources and construction-related air quality, geology, hydrology, and effects would be less intensive than those of the project, since there would not be excavation for a basement. Construction-related noise would be comparable to that of the project, as pile-driving would be employed in the foundation of the new structure. Effects on land use would be similar to those of the project, as both the project and this alternative would consist of office and retail uses. Effects related to potential exposure to hazardous materials in the soil, if any, and to hazardous building materials would be less than those of the proposed project due to the minimal excavation; a modified Site Mitigation Plan would be carried out, as with the project.

Like Alternative C, this alternative would not provide for the maximum uninterrupted retail floorplate, as it would substantially retain the exterior walls of the existing buildings, and would thus not fully meet the sponsor's objectives for development of retail space. Further, construction of this alternative could be substantially more difficult due to the necessity to build a new structure both above and around the existing buildings.

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1 Embarcadero Center, 12th Floor
San Francisco, CA 94111

Sierra Club
730 Polk Street
San Francisco, CA 94109

Sedway Cooke Associates
300 Montgomery Street, Suite 200
San Francisco, CA 94104

Shartsis Freise & Ginsburg
One Maritime Plaza, 18th Floor
San Francisco, CA 94111
Attn: Dave Kremer

Skidmore, Owings & Merrill
333 Bush Street
San Francisco, CA 94104
Attn: John Kriken

Solem & Associates
545 Mission Street
San Francisco, CA 94105
Attn: Olive Lewis

Square One Film & Video
725 Filbert Street
San Francisco, CA 94133

Steefel, Levitt & Weiss
199 - 1st Street
San Francisco, CA 94105
Attn: Robert S. Tandler

Tenants and Owners Development Corp.
230 - Fourth Street
San Francisco, CA 94103
Attn: John Elberling

TRI
100 Pine Street, Suite 2300
San Francisco, CA 94111
Attn: Mathew Cappiello

Jerry Tone
Montgomery Capital Corp.
244 California St.
San Francisco, CA 94111

Jon Twitchell Associates
4419 Moraga Ave.
Oakland, CA 94611

Joel Ventresca
202 Grattan
San Francisco, CA 94117

Stephen Weicker
899 Pine Street, #1610
San Francisco, CA 94108

Calvin Welch
Council of Community Housing
Organizations
409 Clayton Street
San Francisco, CA 94117

Howard Wexler
235 Montgomery, 27th Floor
San Francisco, CA 94104

Eunice Willette
1323 Gilman Avenue
San Francisco, CA 94124

Bethea Wilson & Associates Art In
Architecture
2028 Scott, Suite 204
San Francisco, CA 94115

MEDIA

Associated Press
1390 Market Street, Suite 318
San Francisco, CA 94102
Attn: Bill Shiffman

Leland S. Meyerzone
KPOO - FM
P.O. Box 6149
San Francisco, CA 94101

San Francisco Bay Guardian
2700 - Nineteenth Street
San Francisco, CA 94110
Attn: Patrick Douglas, City Editor

San Francisco Business Times
275 Battery Street, Suite 940
San Francisco, CA 94111
Attn: Tim Turner

San Francisco Chronicle
925 Mission Street
San Francisco, CA 94103
Attn: John King

San Francisco Examiner
P.O. Box 7260
San Francisco, CA 94120
Attn: Gerald Adams

City Editor
San Francisco Independent
1201 Evans Avenue
San Francisco, CA 94124

The Sun Reporter
1366 Turk Street
San Francisco, CA 94115

Tenderloin Times
146 Leavenworth Street
San Francisco, CA 94102
Attn: Rob Waters

NEIGHBORING PROPERTY OWNERS
AND OCCUPANTS

Block 230 Associates
3 Embarcadero Center #2360
San Francisco, CA 94111-4026

Occupant
1 Embarcadero Center #P1
San Francisco, CA 94111

Occupant
1 Embarcadero Center #P2
San Francisco, CA 94111

Occupant
1 Embarcadero Center #P3
San Francisco, CA 94111

Occupant
1 Embarcadero Center #L1
San Francisco, CA 94111

Occupant
1 Embarcadero Center #L2
San Francisco, CA 94111

Occupant
1 Embarcadero Center #L3
San Francisco, CA 94111

Occupant
1 Embarcadero Center #L4
San Francisco, CA 94111

Occupant
1 Embarcadero Center #L5
San Francisco, CA 94111

Occupant
1 Embarcadero Center #L6
San Francisco, CA 94111

Occupant
1 Embarcadero Center #L7
San Francisco, CA 94111

Occupant
1 Embarcadero Center #L8
San Francisco, CA 94111

Occupant
1 Embarcadero Center #L9
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S1
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S2
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S3
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S4
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S5
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S6
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S7
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S8
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S9
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S19
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S11
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S12
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S13
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S14
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S15
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S16
San Francisco, CA 94111

Occupant
1 Embarcadero Center #S17
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 2nd Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center #310
San Francisco, CA 94111

Occupant
1 Embarcadero Center #320
San Francisco, CA 94111

Occupant
1 Embarcadero Center #330
San Francisco, CA 94111

Occupant
1 Embarcadero Center #370
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 4th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 5th Floor
San Francisco, CA 94111

VIII. DEIR Distribution List

Occupant
1 Embarcadero Center #610
San Francisco, CA 94111

Occupant
1 Embarcadero Center #630
San Francisco, CA 94111

Occupant
1 Embarcadero Center #650
San Francisco, CA 94111

Occupant
1 Embarcadero Center #680
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 7th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 8th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center #940
San Francisco, CA 94111

Occupant
1 Embarcadero Center #950
San Francisco, CA 94111

Occupant
1 Embarcadero Center #960
San Francisco, CA 94111

Occupant
1 Embarcadero Center #980
San Francisco, CA 94111

Occupant
1 Embarcadero Center #1020
San Francisco, CA 94111

Occupant
1 Embarcadero Center #1050
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 11th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center #1200
San Francisco, CA 94111

Occupant
1 Embarcadero Center #1250
San Francisco, CA 94111

Occupant
1 Embarcadero Center #1310
San Francisco, CA 94111

Occupant
1 Embarcadero Center #1320
San Francisco, CA 94111

Occupant
1 Embarcadero Center #1340
San Francisco, CA 94111

Occupant
1 Embarcadero Center #1350
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 14th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 15th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 16th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 17th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 18th Floor
San Francisco, CA 94111

VIII. DEIR Distribution List

Occupant
1 Embarcadero Center, 19th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center #1920
San Francisco, CA 94111

Occupant
1 Embarcadero Center #1940
San Francisco, CA 94111

Occupant
1 Embarcadero Center #1950
San Francisco, CA 94111

Occupant
1 Embarcadero Center #1970
San Francisco, CA 94111

Occupant
1 Embarcadero Center #1990
San Francisco, CA 94111

Occupant
1 Embarcadero Center #2100
San Francisco, CA 94111

Occupant
1 Embarcadero Center #2101
San Francisco, CA 94111

Occupant
1 Embarcadero Center #2200
San Francisco, CA 94111

Occupant
1 Embarcadero Center #2220
San Francisco, CA 94111

Occupant
1 Embarcadero Center #2230
San Francisco, CA 94111

Occupant
1 Embarcadero Center #2260
San Francisco, CA 94111

Occupant
1 Embarcadero Center #2300
San Francisco, CA 94111

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1 Embarcadero Center #2320
San Francisco, CA 94111

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1 Embarcadero Center #2330
San Francisco, CA 94111

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1 Embarcadero Center #2340
San Francisco, CA 94111

Occupant
1 Embarcadero Center #2350
San Francisco, CA 94111

Occupant
1 Embarcadero Center #2410
San Francisco, CA 94111

Occupant
1 Embarcadero Center #2420
San Francisco, CA 94111

Occupant
1 Embarcadero Center #2480
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 25th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 26th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center #2700
San Francisco, CA 94111

Occupant
1 Embarcadero Center #2710
San Francisco, CA 94111

VIII. DEIR Distribution List

Occupant
1 Embarcadero Center #2716
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 28th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 29th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 30th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 31st Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 32nd Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center #3303
San Francisco, CA 94111

Occupant
1 Embarcadero Center #3305
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 34th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center #3500
San Francisco, CA 94111

Occupant
1 Embarcadero Center #3550
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 36th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 37th Floor
San Francisco, CA 94111

Occupant
1 Embarcadero Center #3810
San Francisco, CA 94111

Occupant
1 Embarcadero Center #3820
San Francisco, CA 94111

Occupant
1 Embarcadero Center #3860
San Francisco, CA 94111

Occupant
1 Embarcadero Center #3900
San Francisco, CA 94111

Occupant
1 Embarcadero Center #3920
San Francisco, CA 94111

Occupant
1 Embarcadero Center #4000
San Francisco, CA 94111

Occupant
1 Embarcadero Center #4040
San Francisco, CA 94111

Occupant
1 Embarcadero Center #4050
San Francisco, CA 94111

Occupant
1 Embarcadero Center, 41st Floor
San Francisco, CA 94111

Embarcadero Center Associates
3 Embarcadero Center #2360
San Francisco, CA 94111-4026

Occupant
2 Embarcadero Center #S1
San Francisco, CA 94111

VIII. DEIR Distribution List

Occupant
2 Embarcadero Center #S2
San Francisco, CA 94111

Occupant
2 Embarcadero Center #S3
San Francisco, CA 94111

Occupant
2 Embarcadero Center #S4
San Francisco, CA 94111

Occupant
2 Embarcadero Center #S5
San Francisco, CA 94111

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2 Embarcadero Center #S6
San Francisco, CA 94111

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San Francisco, CA 94111

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San Francisco, CA 94111

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San Francisco, CA 94111

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San Francisco, CA 94111

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San Francisco, CA 94111

Occupant
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San Francisco, CA 94111

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San Francisco, CA 94111

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San Francisco, CA 94111

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San Francisco, CA 94111

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San Francisco, CA 94111

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San Francisco, CA 94111

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San Francisco, CA 94111

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San Francisco, CA 94111

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San Francisco, CA 94111

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San Francisco, CA 94111

Occupant
2 Embarcadero Center #P1
San Francisco, CA 94111

Occupant
2 Embarcadero Center #P2
San Francisco, CA 94111

Occupant
2 Embarcadero Center #P3
San Francisco, CA 94111

Occupant
2 Embarcadero Center, 2nd Floor
San Francisco, CA 94111

Occupant
2 Embarcadero Center #310
San Francisco, CA 94111

Occupant
2 Embarcadero Center #320
San Francisco, CA 94111

Occupant
2 Embarcadero Center #330
San Francisco, CA 94111

Occupant
2 Embarcadero Center #420
San Francisco, CA 94111

Occupant
2 Embarcadero Center #430
San Francisco, CA 94111

Occupant
2 Embarcadero Center #470
San Francisco, CA 94111

Occupant
2 Embarcadero Center #480
San Francisco, CA 94111

Occupant
2 Embarcadero Center #T
San Francisco, CA 94111

Occupant
2 Embarcadero Center #610
San Francisco, CA 94111

Occupant
2 Embarcadero Center #620
San Francisco, CA 94111

Occupant
2 Embarcadero Center #660
San Francisco, CA 94111

Occupant
2 Embarcadero Center #670
San Francisco, CA 94111

Occupant
2 Embarcadero Center #740
San Francisco, CA 94111

Occupant
2 Embarcadero Center #750
San Francisco, CA 94111

Occupant
2 Embarcadero Center #780
San Francisco, CA 94111

Occupant
2 Embarcadero Center #790
San Francisco, CA 94111

Occupant
2 Embarcadero Center #840
San Francisco, CA 94111

Occupant
2 Embarcadero Center, 9th Floor
San Francisco, CA 94111

Occupant
2 Embarcadero Center, 10th Floor
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1100
San Francisco, CA 94111

VIII. DEIR Distribution List

Occupant
2 Embarcadero Center #1200
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1680
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1270
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1705
San Francisco, CA 94111

Occupant
2 Embarcadero Center, 13th Floor
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1710
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1400
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1740
San Francisco, CA 94111

Occupant
2 Embarcadero Center, 15th Floor
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1750
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1600
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1765
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1625
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1780
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1645
San Francisco, CA 94111

Occupant
2 Embarcadero Center, 18th Floor
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1650
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1900
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1655
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1960
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1660
San Francisco, CA 94111

Occupant
2 Embarcadero Center, 20th Floor
San Francisco, CA 94111

Occupant
2 Embarcadero Center #1670
San Francisco, CA 94111

Occupant
2 Embarcadero Center, 21st Floor
San Francisco, CA 94111

Occupant
2 Embarcadero Center, 22nd Floor
San Francisco, CA 94111

Occupant
2 Embarcadero Center #2320
San Francisco, CA 94111

Occupant
2 Embarcadero Center #2330
San Francisco, CA 94111

Occupant
2 Embarcadero Center #2350
San Francisco, CA 94111

Occupant
2 Embarcadero Center #2360
San Francisco, CA 94111

Occupant
2 Embarcadero Center #2370
San Francisco, CA 94111

Occupant
2 Embarcadero Center, 24th Floor
San Francisco, CA 94111

Occupant
2 Embarcadero Center #2530
San Francisco, CA 94111

Occupant
2 Embarcadero Center #2540
San Francisco, CA 94111

Occupant
2 Embarcadero Center #2560
San Francisco, CA 94111

Occupant
2 Embarcadero Center #2580
San Francisco, CA 94111

Occupant
2 Embarcadero Center, 26th Floor
San Francisco, CA 94111

Occupant
2 Embarcadero Center, 27th Floor
San Francisco, CA 94111

Occupant
2 Embarcadero Center, 28th Floor
San Francisco, CA 94111

Occupant
2 Embarcadero Center #2900
San Francisco, CA 94111

Occupant
2 Embarcadero Center #2930
San Francisco, CA 94111

Occupant
2 Embarcadero Center #2940
San Francisco, CA 94111

Occupant
2 Embarcadero Center #2980
San Francisco, CA 94111

Occupant
2 Embarcadero Center #3000
San Francisco, CA 94111

Theodore Kniesche et. al.
PO Box 67
Kentfield, CA 94914

Occupant
240 Front Street
San Francisco, CA 94111

Occupant
234 Front Street, 2nd Floor
San Francisco, CA 94111

Occupant
234 Front Street, 3rd Floor
San Francisco, CA 94111

Occupant
234 Front Street, 4th Floor
San Francisco, CA 94111

RREEF USA Fund III
100 California Street #770
San Francisco, CA 94111-4512

Occupant
100 California Street #145
San Francisco, CA 94111

Occupant
100 California Street, 3rd Floor
San Francisco, CA 94111

Occupant
100 California Street #200
San Francisco, CA 94111

Occupant
100 California Street, 4th Floor
San Francisco, CA 94111

Occupant
100 California Street #500
San Francisco, CA 94111

Occupant
100 California Street, 8th Floor
San Francisco, CA 94111

Occupant
100 California Street #600
San Francisco, CA 94111

Occupant
100 California Street, 9th Floor
San Francisco, CA 94111

Occupant
100 California Street #610
San Francisco, CA 94111

Occupant
100 California Street, 10th Floor
San Francisco, CA 94111

Occupant
100 California Street #614
San Francisco, CA 94111

Occupant
100 California Street, 12th Floor
San Francisco, CA 94111

Occupant
100 California Street #650
San Francisco, CA 94111

Occupant
100 California Street #100
San Francisco, CA 94111

Occupant
100 California Street #660
San Francisco, CA 94111

Occupant
100 California Street #120
San Francisco, CA 94111

Occupant
100 California Street #670
San Francisco, CA 94111

Occupant
100 California Street #120A
San Francisco, CA 94111

Occupant
100 California Street #680
San Francisco, CA 94111

Occupant
100 California Street #120B
San Francisco, CA 94111

Occupant
100 California Street #700
San Francisco, CA 94111

Occupant
100 California Street #140
San Francisco, CA 94111

Occupant
100 California Street #720
San Francisco, CA 94111

VIII. DEIR Distribution List

Occupant
100 California Street #735
San Francisco, CA 94111

Occupant
100 California Street #740
San Francisco, CA 94111

Occupant
100 California Street #744
San Francisco, CA 94111

Occupant
100 California Street #770
San Francisco, CA 94111

Occupant
100 California Street #1100
San Francisco, CA 94111

Occupant
100 California Street #1118
San Francisco, CA 94111

Occupant
100 California Street #1140
San Francisco, CA 94111

Occupant
100 California Street #1160
San Francisco, CA 94111

Occupant
100 California Street #1165
San Francisco, CA 94111

Occupant
100 California Street #1170
San Francisco, CA 94111

Occupant
100 California Street #1190
San Francisco, CA 94111

Occupant
100 California Street #1200
San Francisco, CA 94111

Occupant
100 California Street #1300
San Francisco, CA 94111

Occupant
100 California Street #1360
San Francisco, CA 94111

Occupant
100 California Street #1400
San Francisco, CA 94111

Pactel Systems et. al.
130 Kearny Street #3059
San Francisco, CA 94108

259 Front Street Associates
55 Francisco Street
San Francisco, CA 94133-2122

Occupant
301 Sacramento Street
San Francisco, CA 94111

Occupant
303 Sacramento Street
San Francisco, CA 94111

Occupant
303 Sacramento Street, 2nd Floor
San Francisco, CA 94111

Occupant
303 Sacramento Street, 3rd Floor
San Francisco, CA 94111

Occupant
303 Sacramento Street, 4th Floor
San Francisco, CA 94111

Occupant
249 Front Street
San Francisco, CA 94111

IX. APPENDICES

APPENDIX A: INITIAL STUDY

NOTICE THAT AN ENVIRONMENTAL IMPACT REPORT IS DETERMINED TO BE REQUIRED

Date of this Notice: October 27, 1995

Lead Agency: City and County of San Francisco, Planning Department
1660 Mission Street, 5th Floor, San Francisco, CA 94103

Agency Contact Person: Hillary Gitelman **Telephone:** (415) 558-6384

Project Title: 95.343E: **Project Sponsor:** Patson Development Co.
244-256 Front Street
Contact Person: Harry O'Brien

Project Address: 244-256 Front Street, at Sacramento Street
Assessor's Block and Lot: Block 236, Lot 18
City and County: San Francisco

Project Description: Construction of a two-story, approximately 36-foot-tall retail structure on a 12,600-sq.-ft. site following demolition of two two-story buildings at 244-246 and 248-250 Front Street. Both buildings proposed for demolition are rated Category IV - Contributory Buildings under Article 11 of the City Planning Code and are within the Front-California Conservation District. The new building, which would also occupy a former parking lot and a vacant area at the southeast corner of Sacramento and Front Streets, would contain up to about 24,000 gross square feet of retail space. One off-street loading space would be provided.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Initial Study for the project, which is attached.

Deadline for Filing an Appeal of this Determination to the City Planning Commission: November 6, 1995.

An appeal requires:

- 1) a letter specifying the grounds for appeal, and;
- 2) a \$209.00 filing fee.



BARBARA W. SAHM, Environmental Review Officer

244-256 FRONT STREET
INITIAL STUDY
95.343E

I. PROJECT DESCRIPTION

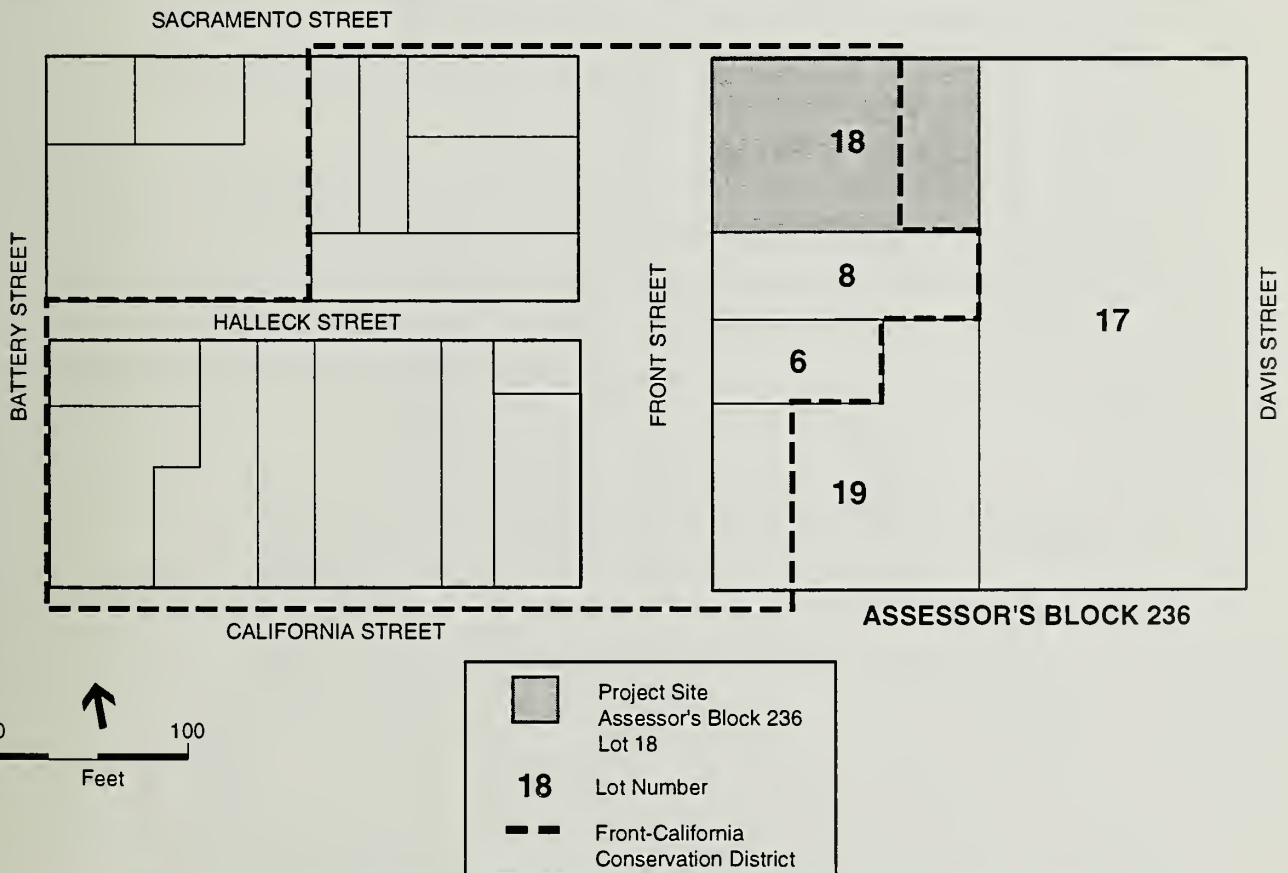
The project site is in Downtown San Francisco, on the southeast corner of Sacramento and Front Streets (see Figure 1). The approximately 12,600-square-foot site consists of Lot 18 of Assessor's Block 236, and is partially occupied by two vacant two-story structures.

The project would demolish the two existing buildings and remove a former parking lot on the site and would construct a two-story, 36-foot-tall building containing up to approximately 24,000 gross square feet (sq. ft.) of retail space (see Figure 2, p. 4).¹ While specific retail tenants have not been identified, it is anticipated that the project would consist of "convenience retail" space (*i.e.*, retail stores that would be expected to serve primarily nearby employees and residents). Lot coverage would be about 97 percent. One off-street loading space would be provided on the Sacramento Street side of the new building.

Each of the two existing structures on the site is about 32 feet tall and each is constructed of unreinforced masonry (brick). Both buildings are designated Category IV - Contributory Buildings under Article 11 of the *City Planning Code*, which addresses preservation of buildings and districts of architectural, historical, and aesthetic importance in the C-3 (Downtown Commercial) zoning districts. Both buildings are also within the Front-California Conservation District. Immediately adjacent to the project site is 236-240 Front Street (Schroeder's Restaurant), which is also designated a Category IV - Contributory Building and is within the Conservation District.

The new building would be a steel-frame structure. Exterior materials would include a combination of stone and brick in an attempt to be sympathetic to nearby historic buildings. As currently proposed, the building would have a corner entrance, with doors on both Sacramento and Front Streets to the primary retail space and an entrance to the secondary ground-floor retail space on Sacramento Street. A second doorway on Front Street near the southern property line

¹ The current plans call for a ground floor and partial second floor, with the principal retail space occupying most of the ground floor and the partial second (mezzanine) level and a smaller separate retail space on the Sacramento Street frontage. This plan would include approximately 18,700 sq. ft. of retail space. For purposes of a conservative analysis, this document assumes a complete second level, which would result in a total of about 24,000 sq. ft.

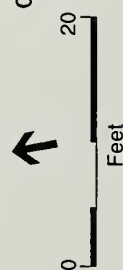
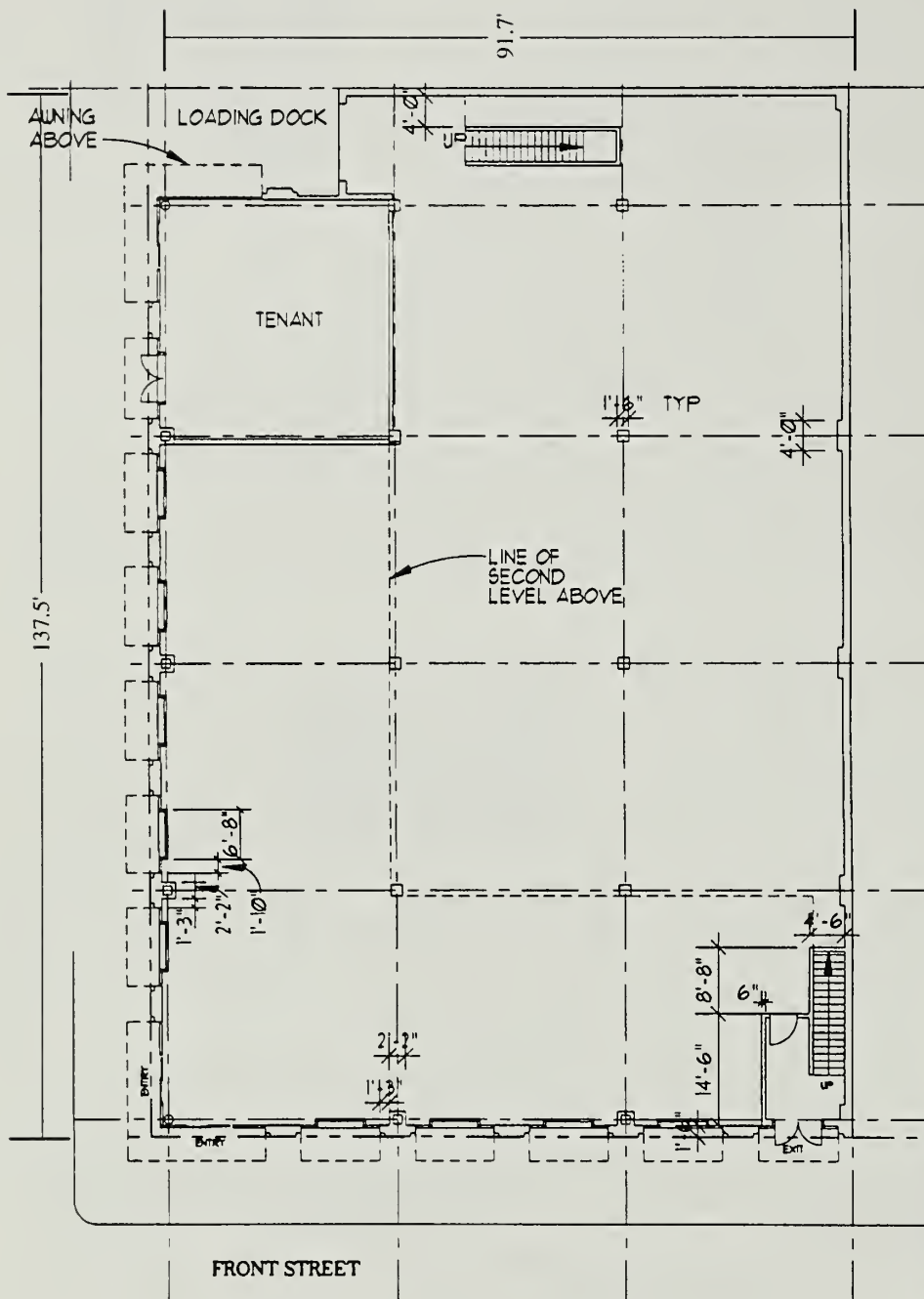


SOURCE: Environmental Science Associates.

Case No. 95.343E 244-256 Front Street ■

Figure 1
Project Location

SACRAMENTO STREET



Case No. 95.343E 244-256 Front Street

Figure 2
Proposed Ground Level Plan

SOURCE: Heller Manus Architects

would serve both the main retail space and the upper level. A second interior stair also would provide access to the upper floor. The off-street loading dock on Sacramento Street would occupy about 350 sq. ft. and would serve uses on both floors.

Project construction would take about 6 to 9 months, including demolition of the existing structures and the parking lot, with occupancy planned for late 1996. Construction cost, including demolition, is estimated at \$2 million (1995 dollars). The project architect is Heller Manus Architects.

II. SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

A. EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

The 244-256 Front Street project is examined in this Initial Study to identify potential effects on the environment. One project-specific effect, impacts on historic architectural resources, has been determined to be potentially significant, and will be analyzed in an Environmental Impact Report (EIR).

B. EFFECTS FOUND NOT TO BE SIGNIFICANT

The following potential impacts were determined either to be insignificant or to be mitigated through measures included in the project. These items are discussed in Section III below, and require no further environmental analysis in the EIR: archaeological resources, land use, visual quality, population, transportation, noise, air quality, utilities/public services, biology, geology/topography, water, energy, and hazards.

III. ENVIRONMENTAL EVALUATION CHECKLIST AND DISCUSSION

		Not	
A. COMPATIBILITY WITH EXISTING ZONING AND PLANS		<u>Discussed</u>	<u>Applicable</u>
1)	Discuss any variances, special authorizations, or changes proposed to the City Planning Code or Zoning Map, if applicable.	<u>X</u>	<u>X</u>
* 2)	Discuss any conflicts with any adopted environmental plans and goals of the City or Region, if applicable.	<u>X</u>	<u>X</u>

The *City Planning Code*, which incorporates by reference the City Zoning Maps, governs permitted uses, densities and configuration of buildings within San Francisco. Permits to construct new buildings or to alter or demolish existing ones may not be issued unless the proposed project conforms to the Code or an exception is granted pursuant to provisions of the Code. The proposed project would comply with the *City Planning Code* requirements concerning height, bulk and use in the C-3-O (Downtown Office) District and the 75-X and 300-S Height and Bulk Districts in which it would be located.

The *City Planning Code* describes the C-3-O District as being primarily devoted to office uses "supported by some related retail and service uses." The district plays "a leading national role in finance, corporate headquarters and service industries, and [serves] as an employment center for the region" (Section 210.3). The district has the City's greatest intensity of building development, although the project site and its immediate vicinity are characterized by relatively lower density uses befitting the smaller structures of the Front-California Conservation District, in which most of the project site is included. The project would be a principal permitted use in the C-3-O district. It also would be within the permitted floor-area-ratio of 9:1 within the C-3-O district. The Front-California Conservation District, established under Article 11 of the *City Planning Code*, provides for review of alteration and demolition of buildings within the district, but does not regulate land uses. For more information on historic buildings and the Front-California Conservation District, please see Section III.B.1, Cultural Resources, p. 8 of this Initial Study.

Most of the project site is within the 75-X Height and Bulk District, while the eastern portion of the site is within the 300-S Height and Bulk District. The 75-X District permits buildings up to 75 feet in height, with no restrictions on bulk. The 300-S District permits buildings up to 300 feet in height, with setbacks (generally above 50 feet), and applies primarily to highrise

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

structures. The project would be within the height and bulk limits of the 75-X district and the 300-S District.

Because it would involve demolition of two Contributory Buildings within the Front-California Conservation District, the project would require approval per Section 1112.1, Demolition of Buildings in Conservation Districts, and Section 1112.2, Disposition of Applications to Demolish Contributory Buildings and Unrated Buildings in Conservation Districts.

The project would require review and approval under Section 309 of the *City Planning Code*, Permit Review in C-3 Districts, which governs the review of project authorization and building and site permit applications in the C-3 Districts. Since the project would not require any exceptions pursuant to Section 309, no public hearing would be required, unless specifically requested in conformance with Section 309, subsection (g). Section 309 permits the imposition of certain conditions in regard to a project's siting and design; view, shadow and wind characteristics; parking, traffic and transit effects; energy consumption; pedestrian environment; and other matters, including issues concerning new construction and alteration within conservation districts. The project would also require approval of demolition and building permits by the Department of Building Inspection.

Environmental plans and policies, like the Bay Area Air Quality Plan, directly address physical environmental issues and/or contain standards or targets that must be met in order to preserve or improve specific components of the City's physical environment. The proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy.

The San Francisco *Master Plan*, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The City Planning Commission would review the project in the context of applicable objectives and policies of the *Master Plan*, including the Downtown Plan, an area plan in the San Francisco *Master Plan*. The relationship of the proposed project to objectives and policies of the *Master Plan* will be discussed in the EIR.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

On November 4, 1986, the voters of San Francisco passed Proposition M, the Accountable Planning Initiative, which established eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under the *California Environmental Quality Act* (CEQA), or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. The motion for the City Planning Commission will contain the analysis determining whether the project is in conformance with the Priority Policies.

B. ENVIRONMENTAL EFFECTS

1) <u>Cultural</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a scientific study?	<u>X</u>	<u> </u>	<u>X</u>
(b) Conflict with established recreational, educational, religious or scientific uses of the area?	<u> </u>	<u>X</u>	<u> </u>
(c) Conflict with the preservation of buildings subject to the provisions of Article 10 or Article 11 of the City Planning Code?	<u>X</u>	<u> </u>	<u>X</u>

An archaeological investigation was previously prepared for a larger area including the project site.² In its natural setting, the project site was submerged beneath 10 to 20 feet of water in what later became known as Yerba Buena Cove, within San Francisco Bay. There is no evidence of

² An archaeological resources report titled "Archival Cultural Resources Evaluation of the Sacramento/Front - California/Front Project, San Francisco, California," was prepared by Allen G. Pastron, Ph.D. of Archeo-Tec, Inc., on May 4, 1988, and is on file at the Office of Environmental Review, San Francisco Planning Department, 1660 Mission Street, San Francisco. That report includes the project site and is summarized here.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

prehistoric activity at or in the immediate vicinity of the project site. The first recorded history in the site vicinity dates from the periods of Spanish and Mexican occupation of California (1775-1845), when various ships called at the Cove. Settlement first occurred during the Gold Rush era (1849-1857), when hundreds of ships were abandoned and left at anchor in the Cove by crew members destined for the Gold Country. Many of these ships were sold, permanently moored, and used as warehouses, bars and hotels ("storeships"). Remains of one such storeship are believed to be buried beneath the southwest corner of Sacramento and Front Streets, across Front Street from the project site. Another storeship, the Salem, was recorded just southeast of the site, on the north side of California Street between Front and Davis Streets. Although not documented, it is possible that debris discarded during modification of one or more storeships may lie beneath the project site.

Prior to filling of Yerba Buena Cove, piers extended into San Francisco Bay from the foot of both California Street and Sacramento Street (Howison's Pier). Howison's Pier was 1,100 feet long and 40 feet wide, reaching well past the project site and into the Bay from the shoreline on Sacramento Street between Montgomery and Sansome Streets. As these and other piers were constructed, cross-streets were built on pilings to link the piers. Later, the enclosed areas were filled to provide additional land for the growing city of San Francisco.

The project site was filled in 1851 and 1852 as part of the overall filling of Yerba Buena Cove. Based on municipal records of the time, it is estimated that between 10 and 20 feet of fill was placed at the site. Fill included dune sand, refuse, and remains of storeships and buildings, many of which burned in a series of early fires that ravaged San Francisco. Buildings were probably first constructed on the site in 1852 (after the great fire of May 1851). These were typically one- and two-story commercial structures, often with residential space above, many probably constructed of brick. The most noteworthy early structure in the project vicinity stood on the project site, at the corner of Sacramento and Front Streets, where the San Francisco Vigilance Committee occupied a two-story brick building (now demolished) that became known as "Fort Gunnybags." Under the leadership of William Tell Coleman, a local businessman and later a political figure, the vigilantes operated a jail and courtroom in the building for several months in 1856 in response to a perception on the part of many San Franciscans of rising lawlessness in the City. (It was the second such committee with which Coleman was associated, the first having formed in 1851.)

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

Records indicate that the project site and surrounding area was occupied by a number of commercial structures beginning in the 1850s. (Coleman himself had a retail store at the northwest corner of California and Front Streets.) The project site was variously occupied by a soap company, liquor rectifying operations, a tobacco company and salt companies, among other uses in the second half of the 19th century. Like most of downtown San Francisco, buildings on the project site were destroyed in the 1906 earthquake and fire. The two existing buildings on the project site were part of the post-earthquake construction boom: the northerly structure, at 248-250 Front Street, was built in 1909, and the building at 244-246 Front Street, in 1913. By 1929, a small service station stood at the corner of Sacramento and Front Streets, where the current vacant building site exists. The area continued to be dominated by retail stores and restaurants, wholesale operators, and small-scale manufacturing, with some offices on the upper floors.

While the potential for the site to contain subsurface cultural resources from the last half of the 19th century - potentially including parts of former Gold Rush-era storeships - is high, the possibility of encountering such artifacts as a result of the proposed project is relatively low because of the limited excavation proposed. The proposed project would be constructed on pre-drilled piles. Drilling and driving of piles could damage subsurface cultural resources, but would not likely destroy resources of substantial size, such as pieces of ships or Gold Rush-era piers, should such resources exist. Limited excavation would be required up to a depth of about three feet to accommodate the grade beams, including beneath the existing basements. Nevertheless, there is a reasonable chance, given the project area's rich history, that subsurface cultural resources could be unearthed during even limited excavation. A mitigation measure has been included in the project to reduce potential impacts to subsurface cultural resources should such resources be encountered during the limited excavation (see p. 32).

Most of the project site is within the Front-California Conservation District, as defined under Article 11 of the *City Planning Code*, which addresses preservation of buildings and districts of architectural, historical, and aesthetic importance in the C-3 zoning districts. Article 11 classifies buildings in the C-3 Districts (generally, Downtown) within four Categories (I through IV), as established in the Downtown Plan element of the San Francisco *Master Plan*. The Downtown Plan identified the most important buildings, called "Significant Buildings," as Category I and Category II buildings. These Category I and II structures are Buildings of Individual Importance, are at least 40 years old, and are rated Excellent in Architectural Design or Very Good in both Architectural Design and Relationship to the Environment, with the difference between

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

Category I and Category II being in the extent of alteration allowed. "Contributory Buildings" were identified as Category III and Category IV buildings. Among Contributory Buildings, Category III buildings are of individual importance, but of lesser architectural and/or contextual merit than Category I and II buildings, and are located outside the six designated Conservation Districts. Category IV buildings are located within Conservation Districts, may be of individual importance or contextual importance, and are of lesser architectural and/or contextual merit than Category I and II buildings. All remaining Downtown buildings are unrated, Category V. Both of the existing on-site buildings are designated Category IV - Contributory Buildings. The two structures, both of which are of unreinforced brick construction, were built in 1909 and 1913. The project's potential effects on the Category IV buildings and the Front-California Conservation District will be discussed in the EIR.

2)	<u>Land Use.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
*	(a) Disrupt or divide the physical arrangement of an established community?	_____	<u>X</u>	<u>X</u>
*	(b) Have any substantial impact upon the existing character of the vicinity?	_____	<u>X</u>	<u>X</u>

The 12,600-sq.-ft. project site currently is occupied by two two-story vacant buildings each containing approximately 6,750-sq.-ft. at 244-246 and 248-250 Front Street, a 3,700-sq.-ft. surface parking lot on the Sacramento Street frontage, and a 4,500-sq.-ft. vacant building site at the corner of Sacramento and Front Streets. The two buildings were most recently used for ground-floor restaurants with offices on the second story.

Land use in the project vicinity is primarily devoted to offices in highrise structures, many of which contain ground-floor retail space. In the immediate site vicinity, along Front, Battery, California, Sacramento and Halleck Streets (within the Front-California Conservation District), smaller buildings predominate. These buildings also have ground-floor retail and restaurant uses, and many have offices above these ground-floor uses. The Embarcadero Center Two highrise office development, across Sacramento Street from the project site, includes retail and restaurant uses on the ground floor and mezzanine level.

The proposed project, a new retail building of approximately 24,000 gross sq. ft., would result in an increase in intensity of existing land uses on the project site, given that the existing buildings are vacant. The project would not alter the general land use of the immediate area, which includes several service retail establishments, including bars and restaurants, a print shop and a

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

financial institution, as well as the Embarcadero Center shops. The project would also not disrupt or divide the neighborhood, since it would be achieved within the existing block configuration.

While the project would not change the character of the area in terms of its land use, and while Land Use requires no further study in the EIR, the small-scale historic character of the area will be discussed in the EIR in the context of potential impacts on the Front-California Conservation District.

3) <u>Visual Quality.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Have a substantial, demonstrable negative aesthetic effect?	_____	<u>X</u>	<u>X</u>
(b) Substantially degrade or obstruct any scenic view or vista now observed from public areas?	_____	<u>X</u>	<u>X</u>
(c) Generate obtrusive light or glare substantially impacting other properties?	_____	<u>X</u>	<u>X</u>

The proposed project would result in a visual change, since it would demolish two existing buildings and replace them and a former parking area with one larger building of similar height.

The two existing buildings on the project site are each two stories in height, finished in yellow brick on the principal (Front Street) facades and red brick on the other exterior walls (see Figure 3). The two buildings are virtually identical in design, with aluminum storefronts and a pair of second-story windows in each building. Detailing includes pilasters (rectangular columns projecting from the walls) on both levels separated by wood moldings above the ground floor. There is a brick parapet atop each building. The existing buildings are about 32 feet in height.

The proposed 36-foot-tall project would be of comparable bulk to other buildings in the immediate vicinity; it would have longer street frontages than many buildings, but would be of comparable height to some and shorter than many others, including the two existing buildings that would remain on the east side of Front Street (234-240 Front and 222 Front). Because the new building would be similar in height and scale to other buildings in the vicinity, and substantially smaller than other, highrise buildings, it could not have a substantial, demonstrable negative aesthetic affect. Also, although the site is visible from Maritime Plaza, a podium-level park in the area, visual changes on the site would not substantially change or block any scenic vista currently enjoyed from that park or other public open spaces in the area.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.



A. Existing Buildings on Project Site



B. East Side of Front Street Between Sacramento and California Streets

SOURCE: Environmental Science Associates.

Case No. 95.343E 244-256 Front Street ■

Figure 3
Project Site and Nearby Buildings

The project would comply with City Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass.

In view of the above, Visual Quality, including urban design and glare, do not require further study in the EIR, although visual changes to the Front-California Conservation District will be discussed.

4) <u>Population.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Induce substantial growth or concentration of population?	_____	<u>X</u>	<u>X</u>
* (b) Displace a large number of people (involving either housing or employment)?	_____	<u>X</u>	<u>X</u>
(c) Create a substantial demand for additional housing in San Francisco, or substantially reduce the housing supply?	_____	<u>X</u>	<u>X</u>

Based on employment densities derived from background research for the Downtown Plan and the Mission Bay Plan, the project could generate up to approximately 69 new jobs.³ No employment would be displaced, as the existing buildings on the project site are vacant. This potential increase in employment would be minimal when considered in the context of Downtown San Francisco, the region's employment center, and would not be expected to have a measurable effect on demand for housing in San Francisco or the Bay Area. Population and housing require no further analysis in the EIR.

³ San Francisco Department of City Planning, "Guidelines for Environmental Review: Transportation Impacts," July 1991.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

5) <u>Transportation / Circulation.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?	_____	<u>X</u>	<u>X</u>
(b) Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic hazards?	_____	<u>X</u>	_____
(c) Cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity?	_____	<u>X</u>	<u>X</u>
(d) Cause a substantial increase in parking demand which cannot be accommodated by existing parking facilities?	_____	<u>X</u>	<u>X</u>

Given its size and location, it is anticipated that the project would consist of convenience retail space (*i.e.*, retail stores that would be expected to serve primarily nearby employees and residents, as opposed to a regional trip-attractor that would be expected to draw most visitors from outside the immediate area). Therefore, a substantial portion of the person-trips (visits) generated by the project would be expected to be pedestrian trips made by persons already in the project vicinity or the downtown area, or would be "linked trips" (trips made in conjunction with another trip, such as a stop on the way home or on the way back to one's office from lunch). In particular, the proximity of the retail shops at Embarcadero Center, across Sacramento Street from the project site, could result in linked shopping trips to the project site and to Embarcadero Center. The trip generation and parking demand figures presented below are based on *Planning Department Guidelines for Environmental Review: Transportation Impacts* (1991), and may be conservative with respect to vehicle trips, given the above assumptions.⁴

The project could generate up to about 3,600 daily and 145 p.m. peak-hour person-trips, including up to about 650 daily vehicle trips and up to about 15 p.m. peak-hour vehicle trips. These trips would not be noticeable against daily background traffic flows; they would also be unlikely to constitute a substantial portion of overall trips anticipated as a result of existing uses plus potential future (*i.e.*, cumulative) development projected in the vicinity.

⁴ Based on the Planning Department's 1993 Citywide Travel Behavior Survey, up to 90 percent of non-commute person trips associated with retail use within Superdistrict 1 (greater Downtown) are by transit, carpool, walking or other non-drive-alone modes. (See Citywide Travel Behavior Survey, May 1993, p. 46, Table II.F.6.)

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

The project would generate a demand for up to about 35 off-street parking spaces, including about 10 long-term and 25 short-term spaces. No off-street parking is proposed. Off-street parking is not required for non-residential uses in the C-3 zoning districts (City Planning Code, Sec. 161). Parking demand would be expected to be accommodated in nearby lots and garages during most hours of the day. Some short-term parking demand could be accommodated on-street or in nearby garages.

The project would provide one off-street loading space of approximately 25 feet by 13 feet, and would meet the City Planning Code requirements for off-street loading (Secs. 152.1 and 154(b)(2)).

The project site is well-served by transit, including MUNI lines 1-California, 12-Folsom, 41-Union, and 42-Downtown Loop, all of which operate within two blocks of the site, as does the California Street cable car. Additional peak-period express service is provided nearby, including shuttle service to the CalTrain Peninsula commute service. Golden Gate Transit bus service to and from the North Bay operates on Battery and Sansome Streets (within two blocks); BART and MUNI Metro rail lines are accessible at the Embarcadero Station, three blocks away; and AC Transit (East Bay) and SamTrans (Peninsula) buses are accessible at the Transbay Terminal, also about three blocks away. In the p.m. peak hour, the project would generate about 25 additional transit riders, including about 20 MUNI riders. These additional riders would be dispersed among several transit lines and would not measurably affect existing service.

Construction activities would involve truck trips to and from the site and could inconvenience drivers in the area. Any construction-related changes to area parking and transit, however, would be temporary and intermittent.

Transportation and circulation require no additional analysis in the EIR.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

6) <u>Noise.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Increase substantially the ambient noise levels for adjoining areas?	_____	<u>X</u>	<u>X</u>
(b) Violate Title 24 Noise Insulation Standards, if applicable?	_____	<u>X</u>	<u>X</u>
(c) Be substantially impacted by existing noise levels?	_____	<u>X</u>	<u>X</u>

Ambient noise in the project vicinity is typical of noise levels in downtown San Francisco, which are dominated by vehicular traffic, including trucks, cars, MUNI buses and emergency vehicles. A 15-minute sidewalk noise measurement taken at the corner of Sacramento and Front Streets in 1988 indicated a noise level of 70 dBA, Leq.^{5, 6} The Environmental Protection Element of the San Francisco *Master Plan* indicated a day-night background noise level (Ldn) of 70 to 75 dBA on most Downtown streets in 1974. The noise level on the project frontages of Sacramento and Front Streets were indicated at 65 dBA.⁷ The Downtown Plan EIR indicates a day-night average noise level (Ldn) of 70 to 75 dBA on Sacramento, Clay and California Streets in 1984.⁸

Demolition, excavation, and building construction would temporarily increase noise in the site vicinity. The construction period, including demolition and grading, would last approximately 9 months. Construction noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers.

Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the City Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source.

⁵ 150 California Street EIR, 87.613E, Final EIR certified May 11, 1989; p. 122.

⁶ dBA is a measure of sound in units of decibels (dB). The "A" denotes the A-weighted scale, which simulates the response of the human ear to various frequencies of sound. Ldn, the day-night average noise level, is a noise measurement based on human reaction to cumulative noise exposure over a 24-hour period, taking into account the greater annoyance of nighttime noises; noise between 10 p.m. and 7 a.m. is weighted 10 dBA higher than daytime noise. Leq, the equivalent noise level, is the average energy content of the noise over a given time period.

⁷ San Francisco Department of City Planning, San Francisco Master Plan, Environmental Protection Element, p. I.6.13,15.

⁸ San Francisco Department of City Planning, Downtown Plan EIR, Case No. 81.3E, certified October 18, 1984, Volume 1, pp. IV.J.1-19, particularly Table IV.J.2, pp. IV.J.9-10.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

Impact tools (jackhammers, pile drivers, impact wrenches) must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by five dBA at the project property line, unless a special permit is authorized by the Director of Public Works.

The project would require pile driving for the foundation system. Pile driving would occur intermittently over about two weeks during placement of piles. Conventional unmuffled and unshielded pile drivers emit typical peak noise levels of 101 dBA at a distance of 50 feet and 95 dBA at a distance of 100 feet each time the driver strikes the pile.

Vibration from the impact during pile driving would be felt in adjacent and nearby buildings. These vibrations have been found to be more disturbing to some people than high noise levels. The Department of Public Works permits pile driving operation under certain conditions, which may include specifying relatively quiet equipment, pre-drilling pile holes, and limiting hours of operation to reduce the number of people exposed to noise effects. The project sponsor has indicated that pile holes would be pre-drilled, which would be expected to reduce vibration and noise effects. While it is unclear whether these potential effects would be significant if unmitigated, pre-drilling of piles is identified as a mitigation measure included in the project (see p. 31).

The Environmental Protection Element of the *Master Plan* contains guidelines for determining the compatibility of various land uses with different noise environments.⁹ For typical retail uses, the guidelines recommend that new construction or development should generally be discouraged at noise levels starting between 75 and 80 dBA. Where background noise levels are found to be about 70 to 75 dBA, the guidelines recommend an analysis of noise reduction requirements and implementation of noise insulation features. It is anticipated that standard noise insulation measures would be included as part of the project design.

Because the project would not result in a substantial increase in traffic in the area (see Section III.B.5, Transportation/Circulation, p. 15 of this Initial Study), it would not result in

⁹ San Francisco Department of City Planning, San Francisco Master Plan, Environmental Protection Element, p. I.6.17.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

perceptibly greater noise levels than those existing in the area. To produce a noticeable increase in environmental noise, a doubling of existing traffic volume would be required.

Construction-related noise, effects related to noise-sensitive receptors, and operational noise anticipated following construction of the project would not be considered significant for reasons stated above, and will not be analyzed in the EIR.

7) <u>Air Quality/Climate</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?	_____	<u>X</u>	<u>X</u>
* (b) Expose sensitive receptors to substantial pollutant concentrations?	_____	<u>X</u>	<u>X</u>
(c) Permeate its vicinity with objectionable odors?	_____	<u>X</u>	_____
(d) Alter wind, moisture or temperature (including sun shading effects) so as to substantially affect public areas, or change the climate either in the community or region?	_____	<u>X</u>	<u>X</u>

The Bay Area Air Quality Management District (BAAQMD) has established thresholds for projects requiring its review for potential air quality impacts. Those thresholds are based on the minimum size projects that the District considers capable of producing air quality problems; the threshold for retail space is 60,000 sq. ft. The project would not exceed this standard. Therefore, no significant operational air quality impacts would be generated by this project.

Demolition, grading and other ground-disturbing construction activities would temporarily affect local air quality for about two months, causing a temporary increase in particulate dust and other pollutants. Dust emission during demolition and excavation would increase particulate concentrations near the site. Dustfall can be expected at times on surfaces within 200 to 800 feet. Under high winds exceeding 12 miles per hour, localized effects including human discomfort might occur downwind from blowing dust. Construction dust is composed primarily of particularly large particles that settle out of the atmosphere more rapidly with increasing distance from the source and are easily filtered by human breathing passages. In general, construction dust would result in more of a nuisance than a health hazard in the vicinity of construction activities. About one-third of the dust generated by construction activities consists of smaller size particles in the range that can be inhaled by humans (*i.e.*, particles 10 microns or smaller in

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

diameter, known as PM₁₀, although those particles are generally inert. Persons with respiratory diseases immediately downwind of the site, as well as any unprotected electronics equipment, could be sensitive to this dust. More of a nuisance than a hazard for most people, this dust could affect persons with respiratory diseases, as well as sensitive electronics or communications equipment. The project sponsor would require the contractor to wet down the construction site twice a day during construction to reduce particulates by at least 50 percent; would require covering soil, sand and other material; and would require street sweeping around demolition and construction sites at least once per day (see mitigation, p. 31).

Section 295 of the City Planning Code was adopted in response to Proposition K (passed in November 1984) in order to protect public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year around. Section 295 restricts new shadow upon public spaces under the jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet unless the City Planning Commission finds the impact to be insignificant. The project would be less than 40 feet tall and would cast limited shadow that would not be substantially greater than is cast by existing buildings or more than is usual in urban areas.

Potential air quality and shadow effects require no further analysis and will not be included in the EIR.

8) <u>Utilities/Public Services.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Breach published national, state or local standards relating to solid waste or litter control?	_____	<u>X</u>	_____
* (b) Extend a sewer trunk line with capacity to serve new development?	_____	<u>X</u>	_____
(c) Substantially increase demand for schools, recreation or other public facilities?	_____	<u>X</u>	_____
(d) Require major expansion of power, water, or communications facilities?	_____	<u>X</u>	<u>X</u>

The proposed project would incrementally increase demand for and use of public services and utilities on the site and increase water consumption, but not in excess of amounts expected and provided for in the project area, and would not be expected to have any measurable impact on public services or utilities. This topic requires no further analysis and will not be included in the EIR.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

9) <u>Biology.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Substantially affect a rare or endangered species of animal or plant or the habitat of the species?	_____	<u>X</u>	<u>X</u>
* (b) Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?	_____	<u>X</u>	_____
(c) Require removal of substantial numbers of mature, scenic trees?	_____	<u>X</u>	_____

The project site is covered primarily by impervious surfaces, including a former parking lot. There is one empty, unpaved building site that contains some common ruderal plant species (species than adapt to disturbed conditions). No trees exist on the site. The project would not affect any threatened, rare or endangered plant life or habitat. The project would not interfere with any resident or migratory species. This topic will not be discussed in the EIR.

10) <u>Geology/Topography.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Expose people or structures to major geologic hazards (slides, subsidence, erosion and liquefaction)?	<u>X</u>	_____	<u>X</u>
(b) Change substantially the topography or any unique geologic or physical features of the site?	_____	<u>X</u>	_____

The site is level, with an elevation of about 0 feet, San Francisco City Datum (SFD).^{10,11} Based on borings made at the site and in the site vicinity, approximately 13 to 18 feet of fill exists beneath the site, consisting of loose to medium-dense silty and gravelly sand with debris. Beneath the fill is a layer of Bay Mud (weak, compressible clay and silt) about 30 to 45 feet thick. The Bay Mud is in turn underlain by interlayered medium-dense to very dense sand, silty

¹⁰ Treadwell & Rollo, Inc., *Geotechnical Consultation*, letter report to David C. Harrison, Patson Development Co., September 20, 1994. Information from that report is summarized here. The report is on file at the San Francisco Planning Department, 1660 Mission Street.

¹¹ San Francisco City Datum (SFD) establishes the City's zero point for surveying purposes at approximately 8.6 feet above mean sea level.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

sand, and clayey sand, and medium-stiff to very stiff clay, silty, sandy clay, and sandy silt. Bedrock is estimated to be at a depth of about 200 feet below the surface.

Groundwater has been measured at the site at 10 to 11 feet below the surface.¹² Existing basements in the two on-site buildings are about 10 feet deep; concrete that could indicate the existence of previous basements was encountered in several test borings beneath the former parking lot and the vacant lot.

The proposed project would be constructed on pre-drilled piles linked by grade beams, which are a grid of steel-reinforced concrete beams. Some existing wood piles beneath the existing structures could remain. The existing buildings on the project site have basements that would either remain or be filled as part of the project. Limited excavation would be required up to a depth of about three feet to accommodate the grade beams, including beneath the existing basements. Dewatering could be required during construction (see Section IV.B.11, Water, p. 23 of this Initial Study).

Pile driving induces ground vibration that may result in compaction and compression of artificial fill and the soft Bay Mud and settlement of the adjacent ground surfaces. In general, the settlement probably would be minor and local in effect as most of the fills and mud have already undergone a good deal of compaction and compression since being emplaced and vibration energy dissipates rapidly in fills. However, for the immediately adjacent four-story Schroeder's Restaurant building (234-240 Front Street) and for Front Street itself and underground pipes within the street, potential settlement could result in some damage, unless proper procedures are followed, including a pre-construction survey of existing conditions and monitoring during construction. The project sponsor has agreed to follow these procedures as well as others recommended by a California-licensed geotechnical engineer as part of subsequent soils studies (see mitigation, p. 31).

The project is in a *Special Geologic Study Area*, as shown in the Community Safety Element of the San Francisco *Master Plan*, because it is potentially subject to liquefaction and subsidence. This map indicates areas in which one or more geotechnical hazards exist with the potential for causing land movement or inundation.

¹² Dames & Moore, *Summary Report, Site Investigation, Pactel Properties, 244-256 Front Street, San Francisco, California*, July 6, 1994. The reports are on file at the San Francisco Planning Department, 1660 Mission Street.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

The final building plans would be reviewed by the Department of Building Inspection (DBI). In reviewing building plans, the DBI refers to a variety of information sources to determine existing hazards and assess requirements for mitigation. Sources reviewed include maps of Special Geologic Study Areas and known landslide areas in San Francisco as well as the building inspectors' working knowledge of areas of special geologic concern. A geotechnical investigation would be available for use by the DBI during its review of building permits for the site (see mitigation, p. 31). Also, the DBI could require that additional site-specific soils report(s) be prepared in conjunction with permit applications, as needed. These procedures, established as part of the permit process, would reduce potential geologic hazards, including those related to earthquakes, to a level that is commonly accepted in San Francisco.

No further analysis of geology and seismicity is required in the EIR.

11) <u>Water</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Substantially degrade water quality, or contaminate a public water supply?	_____	<u>X</u>	_____
* (b) Substantially degrade or deplete ground-water resources, or interfere substantially with groundwater recharge?	_____	<u>X</u>	<u>X</u>
* (c) Cause substantial flooding, erosion or siltation?	_____	<u>X</u>	_____

The project site is mostly covered by impervious surfaces (consisting of an asphalt parking lot and two buildings). The project would cover the entire site with a building and a paved loading dock. The project would increase the area of impervious surface on the site, but not to the extent that there would be a discernible increase in surface runoff from the site. The general drainage pattern of the site would not be altered; site runoff would drain into the City's combined sanitary and storm sewer system.

Based on groundwater measurements made for the geotechnical report for the project, groundwater at the site currently occurs at about 10 to 11 feet below the surface.¹³ The floor of the existing basements is about 10 feet below grade. Because only minor excavation to accommodate grade beams, to a depth of about three feet, would be included in the project, the

¹³ Dames & Moore, *Summary Report, Site Investigation, Pactel Properties, 244-256 Front Street, San Francisco, California*, July 6, 1994. The reports are on file at the San Francisco Planning Department, 1660 Mission Street.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

project would not be expected to require substantial dewatering. Nonetheless, any groundwater encountered during construction would be subject to the requirements of the City's Industrial Waste Ordinance (Ordinance No. 199-77), requiring that groundwater meet specified standards before it may be discharged into the sewer system. The Bureau of Environmental Regulation and Management of the Department of Public Works must be notified of projects necessitating dewatering. That office may require analysis before discharge.

Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. Based upon this discussion, the soils report would contain a determination as to whether or not a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey is recommended, the Department of Building Inspection would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this monitoring. Groundwater monitoring wells and/or instruments would be used to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during construction, groundwater recharge would be used to halt this settlement. The project sponsor would delay construction if necessary. Costs for the survey and any necessary repairs to service lines under the street would be borne by the project sponsor.

No further analysis of water resources is required in the EIR.

12) <u>Energy/Natural Resources</u> . Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	_____	<u> X </u>	<u> X </u>
(b) Have a substantial effect on the potential use, extraction, or depletion of a natural resource?	_____	<u> X </u>	_____

Removal of existing paved parking surface and building demolition would require consumption of an unknown amount of energy. Fabrication and transportation of building materials, worker transportation, site development, and building construction would require about 22.6 billion Btu

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

of gasoline, diesel fuel, natural gas, and electricity.^{14,15} Distributed over the estimated 50-year life of the project, construction-related energy use would be about 0.45 billion Btu per year, or about 15 percent of annual building operational energy requirements.¹⁶

New buildings in San Francisco are required to conform to energy conservation standards specified by Title 24 of the California Code of Regulations. Documentation showing compliance with these standards is submitted with the application for the project's building permit. Title 24 standards are enforced by the Department of Building Inspection.

Table 1 shows the estimated operational energy that would be used by the proposed project. The total net increase of energy consumption for the project would about 3.0 billion BTU annually. Figure 4 (p. 27) show the annual and peak daily electricity and natural gas consumption for the proposed project.

Peak hourly demand for electricity for the proposed project would occur in mid-day in late summer and early autumn and would be about 880 kilowatts (kW), which is about 0.005 percent of PG&E's peak load of 16,600 megawatts (MW).¹⁷ Peak daily demand for natural gas would occur in January and would be about 2,590 cubic feet, less than 0.0001 percent of PG&E's peak day send-out of 3.6 billion cubic feet.¹⁸

¹⁴ The British thermal unit (Btu) is the quantity of heat required to raise the temperature of one pound of water one degree Fahrenheit at sea level; all references to Btu in this Initial Study are at-sources values. The term "at-source" means that adjustments have been made in the calculation of the thermal energy equivalent (Btu) for losses in energy that occur during generation, transmission, and distribution of the various energy forms as specified in:

ERCDC, 1977, Energy Conservation Design Manual for New Non-Residential Buildings, Energy Conservation and Development Commission, Sacramento, California, and Apostolos, J.A., W.R. Shoemaker, and E. C. Shirley, 1978 Energy and Transportation System, California Department of Transportation, Sacramento, California, Project #20-7, Task 8.

¹⁵ Hannon, B., et al., 1978, "Energy and Labor in the Construction Sector," Science 202:837-847.

¹⁶ The estimated 50-year life of the project is considered an industry standard by engineers, architects, and planners. It does not imply that the new proposed Courts Building would "last" only 50 years.

¹⁷ PG&E electrical and natural gas demand is from PG&E's Pacific Gas and Electric Company 1991 Annual Report.

¹⁸ Ibid.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

TABLE 1: ESTIMATED OPERATIONAL ENERGY USE /a,b/

Daily Natural Gas Consumption /c,d/

Estimated natural gas consumption per sq. ft.	33.4 Btu /e/
Estimated total natural gas consumption	8.0 Therms (801,000 Btu)

Monthly Electric Consumption /c,d/

Estimated electricity consumption per sq. ft.	0.93 kWh (9,500 Btu) /d/
Estimated total electricity consumption	22,200 kWh (227,300,000 Btu)

Annual Consumption /d/

Estimated total annual natural gas consumption	2,923 Therms (292,300,000 Btu)
Estimated total annual electricity consumption	266,500 kWh (2.7 billion Btu)
Estimated total annual energy consumption	3.0 billion Btu (540 barrels of oil)

NOTES:

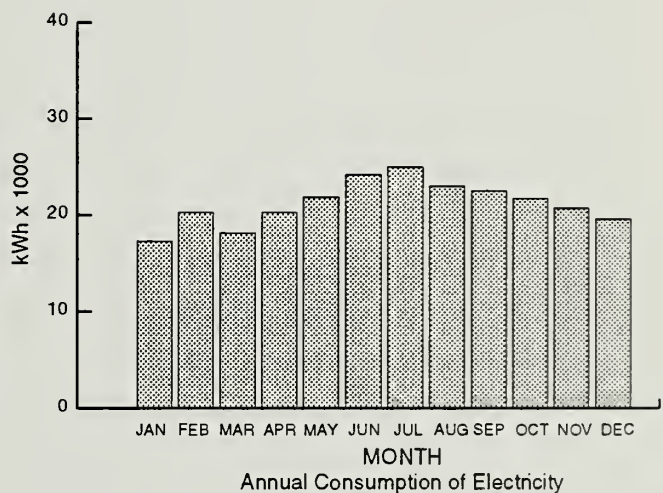
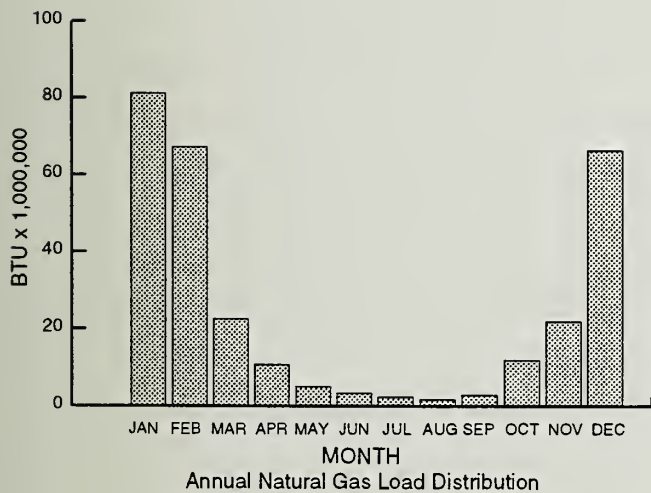
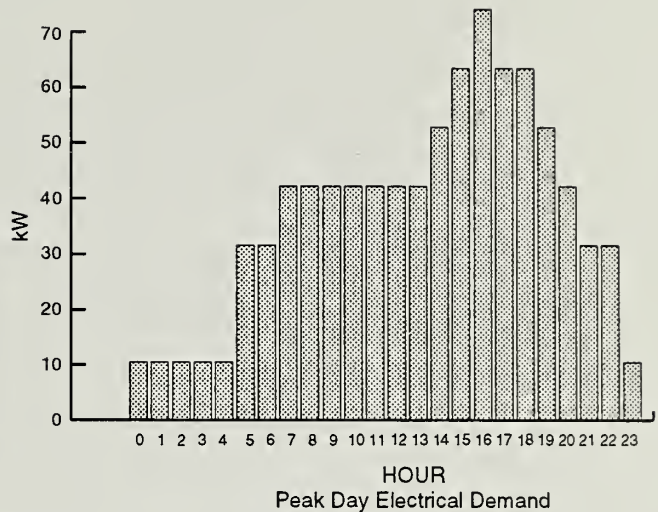
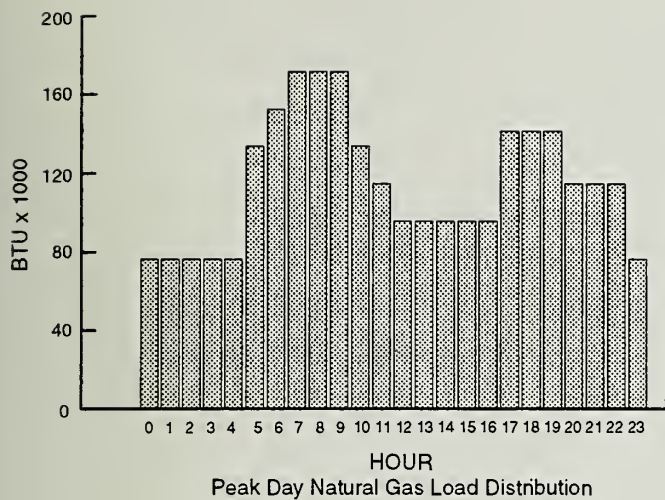
- /a/ Energy use includes space conditioning, service water heating, and lighting in accordance with allowable limits under Title 24.
- /b/ Monthly and annual figures may not match due to rounding to three significant digits.
- /c/ Electricity and natural gas consumption estimated based on energy consumption factors for retail development in *Mission Bay EIR* (86.505EMTZ, August 23, 1990), Appendix H, Table XIV.H.5, p. XIV.H.5, and on *Costco Wholesale EIR* (89.469E, April 16, 1992), Appendix A, Figures 6 and 7, pp. A.25-A.26.
- /d/ Energy Conversion Factors:
- | | | |
|-------------------------|---|--|
| one cu. ft. natural gas | = | 1,050 Btu |
| one kilowatt hour (kWh) | = | 10,239 Btu (includes energy loss during production and transmission) |
| one therm | = | 100,000 Btu |
| one barrel oil | = | 5,600,000 Btu |
- /e/ Btu (British thermal unit: a standard unit for measuring heat. Technically, it is the quantity of heat required to raise the temperature of one pound of water one degree Fahrenheit at sea level.)

SOURCE: Environmental Science Associates

Increased demand for electricity in San Francisco to the year 2000 would be met by PG&E from nuclear sources, oil and gas facilities, hydroelectric and geothermal facilities, and other sources such as cogeneration, wind and imports. PG&E plans to continue receiving most of its natural gas from Canada and Texas under long-term contracts.

This topic, energy consumption impacts, requires no further analysis and will not be discussed in the EIR.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.



SOURCE: Environmental Science Associates.

Case No. 95.343E 244-256 Front Street ■

Figure 4
Estimated Energy Demand and Consumption
Associated with the Proposed Project

13) <u>Hazards.</u> Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
* (a) Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?	_____	<u>X</u>	<u>X</u>
* (b) Interfere with emergency response plans or emergency evacuation plans?	_____	<u>X</u>	_____
(c) Create a potentially substantial fire hazard?	_____	<u>X</u>	_____

Asbestos surveys have not been performed for the existing buildings on the project site, both of which would be demolished. The two buildings were constructed in 1909 and 1913. Based on the age of the structures, it is likely that asbestos-containing materials were used in the buildings and may still be present. Demolition of the existing buildings must comply with State law that requires, where there is asbestos-related work involving 100 square feet or more of asbestos-containing materials, that a contractor be certified and that certain procedures be followed.¹⁹

Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition permits until an applicant has demonstrated compliance with notification requirements under applicable Federal regulations regarding hazardous air pollutants, including asbestos. The Bay Area Air Quality Management District (BAAQMD) is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition. Notification includes the names, addresses and phone numbers of operations and persons responsible, including the contractor; description and location of the structure to be renovated/demolished including size, age and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition; nature of planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The District randomly inspects removal operations. In addition, the District inspects any removal operations concerning which a complaint has been received.

¹⁹ Assembly Bill 2040, Asbestos 1985, Added Section 24223 and Chapter 25 to Division 20 of the Health and Safety Code.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

The local office of the State Occupational Safety and Health Administration (OSHA) must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow State regulations contained in 8 CCR 1529 and 8 CCR 341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of asbestos-containing material.

Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the properties where abatement would occur must have a Hazardous Waste Generator Number assigned by, and registered with, the California Department of Health Services in Sacramento. The contractor and the hauler of the material are required to file a Hazardous Waste Manifest that details the hauling of the material from the site and the disposal of the material. Pursuant to California law, the Department of Building Inspection would not issue the required permit until the applicant has complied with the notice requirements above.

These regulations and procedures, already established as part of the permit review process, would ensure that any potential impacts due to asbestos would be reduced to a level of insignificance.

Article 20 of the San Francisco Public Works Code (the "Maher Ordinance") requires that applicants for building permits within a certain area (largely the part of San Francisco created by landfill) prepare a site history and analyze the site's soil for hazardous wastes. The analysis is required if more than 50 cubic yards of soil are to be disturbed and the project is on fill or is at a location designated for investigation by the director of the Department of Public Works. Where the analysis reveals the presence of hazardous wastes, the ordinance requires site mitigation pursuant to the standards, regulations, and determinations of state and federal regulatory agencies. This mitigation would consist of the removal of hazardous substances and their disposal at an approved disposal site, or other appropriate mitigation.

While the proposed project may not involve more than 50 cubic yards of soil disturbance, in compliance with the Maher Ordinance, a site history report, site investigation report, and preliminary site remediation plans were prepared for the project.²⁰ That analysis found soluble lead concentrations in the soil in excess of state and federal standards. Petroleum hydrocarbons also were detected. Both findings are consistent with results from other Maher-area sites.

²⁰ Dames & Moore, *Summary Report, Site Investigation, Pactel Properties 244-256 Front Street, San Francisco, California*, July 6, 1994. The report is on file at the San Francisco Planning Department, 1660 Mission Street.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

In light of those facts, a Site Mitigation Plan was prepared for the project and submitted to the Department of Public Health.²¹ The Site Mitigation Plan proposes to minimize the amount of excavation to be done at the site (thereby minimizing potential worker or public exposure to hazardous waste), to remove and properly dispose of contaminated soil disturbed during excavation and grading, and to encapsulate remaining on-site soils beneath the building foundation and floor slab. The Site Mitigation Plan was reviewed by the Department of Public Health on October 13, 1995, and found to satisfy Article 20 requirements as long as a workplan is provided to the construction contractor explaining a protocol including, but not limited to, dust suppression measures.²² The project sponsor has agreed to implement the Site Mitigation Plan with conditions imposed by the Department of Public Health (see mitigation, p. 31).

Other potential hazardous building materials such as lead-based paint or PCB-containing electrical equipment could pose health threats for demolition workers but would be mitigated by standard building surveys and abatement. At least one of the two existing buildings (248-250 Front Street) has an elevator, although it is not operable. The second building may have had an elevator at one time. Elevators may be operated by hydraulic oils; in the past, some of these oils contained PCBs. Mitigation is included in the project to reduce impacts of hazardous building materials (see p. 32).

All potential health and safety issues related to building contamination and soil contamination and remediation would be reduced to a level of insignificance by mitigation measures included in the project, or would be regulated by current laws and construction practices; these issues do not require further analysis and will not be discussed in the EIR.

C. OTHER	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
Require approval and/or permits from City Departments other than Department of City Planning or Department of Building Inspection, or from Regional, State, or Federal Agencies?	_____	<u> X </u>	_____

²¹ Dames & Moore, *Site Mitigation Plan, 244-256 Front Street, San Francisco, California*, July 13, 1995. The report is on file at the San Francisco Planning Department, 1660 Mission Street.

²² Ben Gale, Director, City and County of San Francisco Department of Public Health, letter to Director of Public Works and to David C. Harrison, Olympic / Main Associates, October 13, 1995. The approval letter is on file at the San Francisco Planning Department, 1660 Mission Street.

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

D. MITIGATION MEASURES	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Discussed</u>
1) Could the project have significant effects if mitigation measures are not included in the project?	<u>X</u>	<u> </u>	<u> </u>	<u>X</u>
2) Are all mitigation measures necessary to eliminate significant effects included in the project?	<u> </u>	<u>X</u>	<u> </u>	<u>X</u>

The following are mitigation measures related to topics determined to require no further analysis in the EIR. The EIR will contain a mitigation chapter describing these measures, which are proposed as part of the project, and also including other measures which would be, or could be, adopted to reduce potential adverse effects of the project identified in the EIR.

Noise and Vibration

- The project sponsor would require the construction contractor to pre-drill piles where soil conditions permit.

Construction Air Quality

- The project sponsor would require the contractor(s) to sprinkle demolition sites with water during demolition, excavation and construction activity; sprinkle unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soil, sand or other such material; and sweep surrounding streets during demolition and construction at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose.

Geology

- One or more geotechnical investigations by a California-licensed geotechnical engineer are included as part of the project. The project sponsor and contractor would follow the recommendations of the final geotechnical report(s) regarding any excavation and construction for the project. The project sponsor would ensure that the construction contractor conducts a pre-construction survey of existing conditions and monitors the adjacent building for damage during construction, if recommended by the geotechnical engineer.

Hazards

- In the event that project construction would involve excavation of more than 50 cubic yards of soil, requirements established by Article 20 of the San Francisco Public Works Code (*i.e.*, the "Maher Ordinance") would reduce potential effects related to soil contamination to a less-than-significant level. In the event that project construction would

involve excavation of less than 50 cubic yards, and/or would encapsulate soil containing hydrocarbons and soluble lead concentrations above established thresholds, the requirements of Article 20 would not strictly apply, although the project sponsor has prepared a Site Mitigation Plan (refer to page 30) and has agreed to ensure that the Site Mitigation Plan is implemented with oversight from the City's Department of Public Health.

The Plan would require that the construction contractor limit the amount of excavation, handle and dispose of excavated soils properly, and encapsulate remaining soils on-site, and also would require a State Registered Professional Geologist or Engineer to certify, at the completion of foundation activities, that all elements of the Site Mitigation Plan had been performed in compliance with Article 20 requirements. Conditions imposed by the Department of Public Health would require dust control measures to ensure "no visible dust" emissions, covering of soil stockpiles, rain water runoff control, and designation of a person with the authority to stop work at any time if a release of contaminated soil occurs or is threatened.

- The project sponsor would ensure that building surveys for asbestos, PCB-containing equipment (including elevator equipment), hydraulic oils, fluorescent lights, and lead-based paint are performed prior to the start of demolition. (Removal and proper disposal of the hydraulic lift and associated fluids was included in the Site Mitigation Plan.) Any hazardous materials so discovered would be abated according to federal, state, and local laws and regulations.

Cultural Resources

- Given the location and magnitude of excavation proposed, and the possibility that archeological resources would be encountered on the project site, the sponsor has agreed to retain the services of an archaeologist. The archaeologist would first determine, in conjunction with the Environmental Review Officer (ERO), whether he/she should instruct all excavation and foundation crews on the project site of the potential for discovery of archaeological resources, and the procedures to be followed if such resources are uncovered.

The archeologist would then design and carry out a program of on-site monitoring of all ground-disturbing activities, during which he/she would record observations in a permanent log. The monitoring program, whether or not there are finds of significance, would result in a written report to be submitted first and directly to the ERO, with a copy to the project sponsor. During the monitoring program, the project sponsor would designate one individual on site as his/her representative. This representative would have the authority to suspend work at the site to give the archaeologist time to investigate and evaluate archaeological resources should they be encountered.

Should evidence of cultural resources of potential significant be found during the monitoring program, the archaeologist would immediately notify the Environmental Review Officer (ERO), and the project sponsor would halt any activities which the archaeologist and the ERO jointly determine could damage such cultural resources. Ground-disturbing activities that might damage cultural resources would be suspended for a total maximum of four weeks cumulatively over the course of construction.

After notifying the ERO, the archaeologist would prepare a written report to be submitted first and directly to the ERO, with a copy to the project sponsor, which would contain an assessment of the potential significance of the find and recommendations for what measures should be implemented to minimize potential effects on archaeological resources. Based on this report, the ERO would recommend specific additional mitigation measures to be implemented by the project sponsor.

Mitigation measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation, and recovery of cultural material. Finally, the archaeologist would prepare a draft final report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure would be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report would be sent to the President of the Landmarks Preservation Advisory Board and the Northwest Information Center of the California Historical Resources Information System. The Office of Environmental Review shall receive three copies of the final archaeological report.

E. ALTERNATIVES

Alternatives to the proposed project will be discussed in the EIR and will include the following:

- A. No Project: The site would remain in its existing condition, with the two structures, parking lot and vacant site.
- B. Seismic Upgrade and Adaptive Reuse: The two existing buildings on the project site would be rehabilitated and seismically upgraded. The buildings would be used for retail stores, as with the proposed project. The existing parking lot would be reused, and the vacant site would remain vacant.
- C. Seismic Upgrade, Adaptive Reuse and New Construction. The two existing buildings on the project site would be rehabilitated and seismically upgraded. A single new structure would be built on the vacant site and on the parking lot, wrapping around the historic buildings. The three buildings would be occupied by retail uses, as with the proposed project.

F. MANDATORY FINDINGS OF SIGNIFICANCE Yes No Discussed

- * 1) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or pre-history? X
- * 2) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? X
- * 3) Does the project have possible environmental effects which are individually limited, but cumulatively considerable? (Analyze in the light of past projects, other current projects, and probable future projects.) X
- * 4) Would the project cause substantial adverse effects on human beings, either directly or indirectly? X

The project could affect architectural resources, including the Front-California Conservation District and contributory buildings within the district. Effects on the Conservation District may be most severe when considered in light of other changes that have already occurred in the District. The EIR will consider these issues.

G. ON THE BASIS OF THIS INITIAL STUDY

 I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.

 I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers , in the discussion have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared.

X I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Barbara W. Sahm
BARBARA W. SAHM
Environmental Review Officer
for

LUCIAN R. BLAZEJ
Director of Planning

DATE: 10/25/95

* Derived from State EIR Guidelines, Appendix G, normally significant effect.

The following is added as a new Appendix in Chapter IX:

APPENDIX B: STRUCTURAL EVALUATION OF EXISTING BUILDINGS

Following publication of the DEIR in December 1995, the project sponsor commissioned a structural engineering report by Culley Associates, Inc., that evaluates the work that would be required to strengthen the buildings in accordance with the City's Unreinforced Masonry Building (UMB) Ordinance.¹ The report states of the north and south (side) walls, "Other than some cracks visible on the second floor near the center of 248-250 [Front]'s north wall which appear to have been repaired, the masonry seems to be in reasonably good condition." Regarding the west (Front Street) walls, the report does not identify structural condition, but states, "No apparent bond courses were visible in the facade brickwork, and it is possible that this is an unbonded veneer face. An inspection will have to be conducted in order to verify the nature of the veneer's connection to the walls and to ascertain if veneer pins or anchors will be necessary."² The report also states that Emergency Structural Repairs to the two buildings were carried out in November 1989, consisting primarily of installation of wall anchors at the second story and roof levels, of blocking between the floor joists, and of steel straps on the east wall. The report states that these repairs do not satisfy the requirements of the UMB Ordinance.³

The Culley report evaluates the work that would be required to upgrade the buildings and reuse them in accordance with the general schemes presented in Chapter VII of the 1995 DEIR (Alternatives); that is, Alternative B, which would have included seismic strengthening and reuse of the two buildings on their own, and Alternative C, which would have included seismic strengthening and reuse of the two buildings plus new construction of a physically connected two-story retail building, as contemplated in the 1995 DEIR. The portion of the Culley report that describes the required seismic upgrading is summarized here, as it remains generally applicable to the existing buildings, despite the changed project.

The Culley report states that the existing buildings would be required to be strengthened using the so-called "Special Procedure" of seismic retrofit under the City's UMB Ordinance, which is a

¹ Culley Associates, Inc., "Seismic Resistance Evaluation For: 246 and 248-250 Front Street," 5 February 1996. A copy of this report is available for public review at the San Francisco Planning Department, 1660 Mission Street.

² Culley Associates, op. cit., p. 4.

³ Culley Associates, op. cit., p. 5.

strengthening procedure permissible for use in certain buildings of six stories or less.⁴ The "Special Procedure" is a less intensive retrofit scheme than would be required under the "General Procedure" that applies to many UMBs. The report identifies retrofitting schemes for both stand-alone retrofit of the existing buildings (the 1995 DEIR Alternative B) and retrofit linked to new construction (the 1995 DEIR Alternative C, also applicable to Alternatives B and C in the 1997 Supplement to the DEIR). The two schemes share many components, but differ in some specifics because the construction of a new building is assumed to include physical connections between the existing buildings and the new building. Also, the program identified in the Culley report for retrofit linked to new construction assumes a level of work that would be expected to qualify for a 10 percent federal tax credit that is available to owners of certain historic properties who rehabilitate those properties in accordance with the Secretary of the Interior's Standards for Rehabilitation. The seismic strengthening scheme for retrofit linked to new construction therefore assumes that the two existing buildings would remain as separate structures, while the stand-alone retrofit scheme would physically connect the two buildings.

The seismic retrofit scheme for stand-alone retrofit would include:

- Installation of a structural steel moment frame⁵ in the west (Front Street) wall of one of the two buildings to provide resistance against lateral movement; connecting the two buildings with epoxy-grouted steel rods at their adjacent east-west trending walls; and installation of "collector" beams linking the unreinforced building to the moment frame.
- Installation of a diagonally braced frame in the center of one of the two buildings and at the inner (east) rear wall in both buildings.^{6,7}
- Strengthening the existing floors and roofs by installation of additional plywood sheathing, and connecting the floors and roofs to the walls by means of epoxy-grouted steel rods, steel angles and steel straps.
- Construction of new foundation footings to accommodate the structural frames.

For retrofit linked to new construction, both buildings would receive a moment frame in the west (Front Street) walls and a diagonally braced frame across the center, and the buildings would not

⁴ To qualify for the "Special Procedure," a building must be no more than six stories above basement, must have wood floors and ceilings, must not house an essential or hazardous facility, and must have (either existing or through retrofit) two lines of lateral support (*i.e.*, shear walls) in each direction.

⁵ A moment frame, which is a rectangular structural steel frame, would be employed in west wall, as opposed to a diagonally braced frame, to avoid diagonal steel braces being visible in the west windows.

⁶ Each building has a rear wall that extends to the first floor, and a second-story rear wall that stepped in 7 feet west of the first-floor wall.

⁷ The east wall frame would extend only to the first floor ceiling in one of the two buildings.

be anchored together. The walls between the two buildings and between the northerly building (250 Front) and the new construction would be reinforced with shotcrete (a sprayed-on concrete material), and movement joints would be installed at the openings between the buildings. In addition, the diagonally braced frames in each east building's wall would extend to the roof.

Subsequently, the sponsor requested that Culley Associates evaluate a second scheme for retrofit linked to new construction that would include moment frames at the east and west walls of each building and in the center of each building, instead of diagonal "K" braces, to minimize intrusion of structural elements into the building interiors. As with the first scheme for retrofit linked to new construction, the two structures would remain separate; other aspects of the first plan would also remain the same. Because it would not include diagonal braces, this plan would be less disruptive to the building interiors than would the previously evaluated proposal.

The project sponsor estimates that retaining the existing buildings and constructing the moment frames would result in a development that essentially provides the same amount of ground-floor retail space as the proposed project, with a loss of approximately 400 gross sq. ft., compared to the proposed project, or about 2 percent of the total floor area. However, the sponsor believes that retention of the existing building walls (with the exception of openings between buildings), as envisioned by the second scheme for retrofit linked to new construction described above, would severely inhibit the marketability of the retail portion of project.⁸

The project sponsor has also indicated, based on communications from its insurance broker, that earthquake insurance for a building involving retrofit linked to new construction would be substantially more expensive than for the proposed project because of the difficulty and cost of insuring older masonry buildings.⁹

⁸ Jones, Richard E., Patson Development Company, letter, March 14, 1996. The sponsor has submitted to the Landmarks Preservation Advisory Board correspondence dated June 25, 1996, from Jill J. Paul, Senior Associate, CB Commercial Properties, stating that Alternative C "would severely limit the flexibility and the leasability of this project." The letter indicates that the existing buildings are relatively narrow for their depth, which limits their usefulness leased separately, and that retention of most of the existing walls would obstruct retailer's merchandising and therefore limit the attractiveness of the building to most retailers who might lease an entire floor. A copy of this letter is on file at the San Francisco Planning Department, 1660 Mission Street.

⁹ Shockley, Leila M., Willis Corroon of California Insurance Services, letter to Richard E. Jones, Patson Development Company, March 14, 1996.

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Changes and additions are indicated by double underlining.

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TO: San Francisco Planning Department,
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Please send me a copy of the Final EIR.

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